

**REVIEW MEMORANDUM**  
**DRAFT REGULATION NO. 1130 (TITLE V) OPERATING PERMIT**

**The Premcor Refining Group Inc.**  
**4550 Wrangle Hill Road**  
**Delaware City, Delaware 19706**  
**Permit No.: AQM-003/00016 – Parts 1, 2 and 3 (Significant Modification)**

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**BACKGROUND**

This memorandum constitutes the Air Quality Management (AQM) Section's review of an application submitted by The Premcor Refining Group, Inc. (Premcor) for a significant permit modification of the Regulation No. 30 (Title V) permit Parts 1, 2 and 3 for the Delaware City Refinery (DCR)<sup>1</sup>. Premcor owns and operates the Delaware City Refinery (DCR), NAICS Code 32411, located on a 5,000 acre tract in Delaware City and between US Route 13 and Delaware Route 9. The DCR has the potential to emit greater than 25 tons per year NO<sub>x</sub> and VOCs, greater than 100 tons per year SO<sub>2</sub>, greater than 100 tons per year CO, and greater than 25 tons per year hazardous air pollutants (HAPS) listed in Section 112(b) of the CAAA of 1990. Therefore, the DCR is subject to Regulation 30. Because of the inherent complexity of this facility coupled with the fact that the majority of process units are major sources themselves, AQM structured the title V permit in 3 parts. On May 27, 2007, AQM issued renewals of Parts 1 and 3 and part 2 for the first time. Since then there have been several changes at the refinery which has necessitated this permitting action.

This memorandum addresses the following changes to Parts 1, 2 and 3 of the Permit<sup>2</sup>:

1. Administrative amendments;
2. Minor modifications; and
3. Significant modifications

The purpose of this application for significant permit modification includes the following:

1. To incorporate the new applicable requirements from recently issued Regulation 1102 operation permits;
2. To modify the monitoring, recordkeeping and reporting requirements for fuel gas streams that are subject to the NSPS Subpart J Alternative Monitoring Plan (AMP) due to the recent revisions of the NSPS Subpart J requirements for monitoring fuel gas streams; and
3. To address sections of the permit where monitoring, recordkeeping and reporting requirements can be streamlined or clarified.

DCR's application for Significant Permit Modification was signed by Mr. John Pickering, Vice

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<sup>1</sup> The DCR was owned by Star Enterprises at the time the title V application was submitted to the Department. On July 1, 1998, Shell Oil Products (Shell), Saudi Refining, Inc., and Texaco Inc. formed Motiva, combining the major elements of Shell's and Star's eastern and southern refining and marketing businesses. The ownership of Star Enterprise was transferred to Motiva L.L.C. on October 1998. In October 2001, Texaco Inc. divested itself of its share in the Company. Motiva sold the DCR to The Premcor Refining Group Inc. on May 1, 2004. On September 1, 2005, Premcor, in turn, was acquired as a wholly owned subsidiary by The Valero Energy Corporation (Valero).

<sup>2</sup> AQM has addressed the applicable requirements for the significant modification of all 3 parts of this TV permit in this review memorandum as a single document. However, because of the complexity of each individual part and because additional modifications to each part will be made over the next few years, AQM does not recommend consolidating the 3 parts into a single permit at this time. Therefore, the TV permit for this facility continues to be structured in 3 parts.

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President and General Manager, who meets the requirements of being a “Responsible Official” as defined in 7 **DE Admin. Code** 1130, Section 2.

Premcor is subject to the requirements of Section 112(r) of the 1990 Clean Air Act Amendments and has registered with the State of Delaware “Regulations for the Management of Extremely Hazardous Substances.”

Premcor has not made a request for any material in the application for significant permit modification to be treated as confidential business information.

Premcor has paid the applicable fees associated with 7 **DE Admin. Code** 1130.

Premcor has not requested that any information be considered confidential.

**CORRESPONDENCE CHRONOLOGY**

**Table 1: Chronology of Correspondence**

<b>Correspondence/Date</b>	<b>Subject</b>
Permit application dated February 27, 2009 for Significant Permit Modification submitted on March 5, 2009	Application for Significant Permit Modification
Application completeness determination letter from Ravi Rangan dated April 20, 2009	Application was found to be complete

**EMISSION POINT AND EMISSION UNIT IDENTIFICATION**

Table 2 identifies the emission points and emission units subject to Part 1 of this Title V operating permit:

**Table 2: Emissions Units Covered By Part 1**

<b>Emission Unit</b>	<b>Emission Point</b>	<b>Emission Point Description</b>
HDS	29-1	Catalytic Hydrodesulfurizer Train 1 feed heater (29-H-101) and fractionator heater (29-H-8)
	29-2	Catalytic Hydrodesulfurizer Train 2 feed/fractionator heater (29-H-2), Train 3 feed heater (29-H-3) and fractionator reboiler heater (29-H-9)
	29-3	Catalytic Hydrodesulfurizer Train 4 feed heater (29-H-4) and Train 4 fractionator heater (29-H-7)
	29-4	Catalytic Hydrodesulfurizer Train 5 fractionator heater (29-H-6) and Train 5 feed heater (29-H-5)
Tetra	Fugitives	Tanks
	32-1	Tetra unit feed heater (32-H-101)
SHU	33-1	Selective Hydrogenation unit startup heater (33-H-1)
	33-2	Selective Hydrogenation unit startup heater (33-H-2)
Olefins	34-1	Olefins reboiler heater (34-H-101)

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HC	36-1	Hydrocracker unit feed heater (36-H-1)
	36-2	Hydrocracker unit column reboiler (36-H-2)
	36-3	Hydrocracker unit fractionator reboiler (36-H-3)
FES	40-1	Refinery frozen earth propane storage flare system
TF	Various	Refinery Tank Farm classified under 11 groups based on type of construction, type of seal, vapor pressure of the stored liquid and the regulatory applicability of different regulations.
EP	Fugitives	Ether Plant

**Table 3: Emissions Units Covered By Part 2**

<b>Emission Unit</b>	<b>Emission Point/s</b>	<b>Emission Point Description</b>
WWTP	Carbon canister locations <sup>3</sup>	Oily Sewer System, API/CPI separators, flash mix tank, spill diversion and equalization tanks, 2 flocculation tanks and dissolved nitrogen floatation (DNF) system
	10-1	DNF Oil Recovery System and Vapor Combustion Unit (VCU)
	No emission points	Secondary and tertiary treatment equipment (downstream of DNF), 1 <sup>st</sup> and 2 <sup>nd</sup> stage activated sludge, sand filtration and assorted sumps and equipment
GDF	N/A	Gasoline dispensing facility
MVR	15-1 and 15-2	Marine piers 2 and 3 loading area
CU	21-1	Crude Unit, Atmospheric heater 21-H-701, and vacuum heater 21-H-2
	21-1 or 28-1 or 28-2	Crude coker gasoline Merox treater
	28-1 or 28-2	SWS hydrogen sulfide stripping vessel, 21-C-302
FCU	22-1	Fluid coke handling and storage facility
	22-2	Fluid Coking Unit (FCU), FCU start up heater 22-H-1, CO Boiler (22-H-3), wet gas scrubber and SNCR
	22-3	Back up incinerator 22-H-4
	22-4	FCU Selas Steam Superheater
FCCU	23-1	FCCU start up heaters 23-H-1A and 1B, FCCU, CO Boiler (22-H-3), wet gas scrubber, alky merox spent air, and poly merox spent air
GP	No emission Points	Refinery gas plant
RFG2K	25-4 and 25-5	CNHT reactor charge heater 25-H-401, CNHT reboiler heater 25-H-402, CHNT unit, reformer, butamer unit

<sup>3</sup> Carbon canisters are located at various parts of the oily sewer system and the primary treatment plant. The details of the locations are described in Section A of the accompanying review memorandum.

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ALKY	No emission Points	Aklylation unit
POLY	No emission Points	Polymerization unit
SRA	28-1 and 28-2	Sulfur recovery area inclusive of 2 Claus sulfur recovery units (SRU I and SRU II), Shell Claus Offgas Treatment Units I (SCOT I and II)
HP	37-1A and 37-1B	Hydrogen plant and reformer heater 37-H-1 A/B
MP	41-1 and 41-2	This unit has been shut down with no foreseeable plan to restart
CCR	42-1 and 42-2	CCR reformer unit, platform heater 42-H-1,2,3 and CCR reboiler 42-H-7
Utilities	45-1 and 45-2	Refinery flare system, spent caustic stripper and RFG2K cooling tower
Facility wide		See Condition 3 - Table 1 (Specific Conditions)

**Table 4: Emissions Units Covered By Part 3**

Emission Units		Emission Unit Description
DCPP	80-1	Boiler 1 (618 mmBTU/hr input, natural gas and desulfurized refinery fuel gas fired)
	80-2	Boiler 2 (716 mmBTU/hr input, natural gas and desulfurized refinery fuel gas fired)
	80-3	Boiler 3 (618 mmBTU/hr input, syngas, natural gas, and desulfurized refinery fuel gas fired)
	80-4	Boiler 4 (737 mmBTU/hr input, desulfurized refinery fuel gas fired)
Gas Plant	82	Texaco Gasifier 1 (235 ton/hr synthesis gas from both Gasifiers 1 and 2)
	82	Quench (gas cooler) for Gasifier 1
	82	Texaco Gasifier 2 (235 ton/hr synthesis gas from both Gasifiers 1 and 2)
	82	Quench (gas cooler) for Gasifier 2
	82	Amine Acid Gas Removal system
	82	Syngas Flare
	50	Three-Cell Linear Mechanical Draft Evaporative Cooler (gas flow of 3,000,000 ACFM, cooling water flow of 30,000 gallons per minute)
CCU	84	CCU1 & CCU2 - Each, one Gas Turbine (LHV input of 824.7 mmBTU/hr, HHV input of 878.4 mmBTU/hr, syngas or low sulfur diesel fuel fired)
	84	Duct Burner (215 mmBTU/hr, HHV of 215 mmBTU/hr, natural gas fired, one each, CCU1 & CCU2)
	84	Heat Recovery Steam Generator (one each, CCU1 & CCU2)
	84	Electric Generator (90 MW nominal, one each, CCU1 & CCU2)

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**INSIGNIFICANT ACTIVITIES**

Insignificant activities are included in Part 2 of the refinery's Title V permit.

**CURRENT 7 DE Admin. Code 1102 PERMITS**

**Table 5: 7 DE Admin. Code 1102 Permits Covered By Part 1**

7 DE Admin. Code 1102 Permit	Unit Description
<b><u>APC-82/0633-OPERATION</u></b> issued February 8, 1985	Heater Unit 29-H-101
<b><u>APC-81/0790-OPERATION</u></b> issued June 17, 1981	Heater Unit 29-H-2
<b><u>APC-81/0791-OPERATION</u></b> issued June 17, 1981	Heater Unit 29-H-3
<b><u>APC-81/0792-OPERATION</u></b> issued June 17, 1981	Heater Unit 29-H-4
<b><u>APC-81/0793-OPERATION</u></b> issued June 17, 1981	Heater Unit 29-H-5
<b><u>APC-81/0794-OPERATION</u></b> issued June 17, 1981	Heater Unit 29-H-6
<b><u>APC-81/0795-OPERATION</u></b> issued June 17, 1981	Heater Unit 29-H-7
<b><u>APC-81/0796-OPERATION</u></b> issued June 17, 1981	Heater Unit 29-H-8
<b><u>APC-81/0797-OPERATION</u></b> issued June 17, 1981	Heater Unit 29-H-9
<b><u>APC-81/0873-OPERATION</u></b> issued August 21, 1981	Hydrodesulfurizer Train I
<b><u>APC-81/0874-OPERATION</u></b> issued August 21, 1981	Hydrodesulfurizer Train II
<b><u>APC-81/0875-OPERATION</u></b> issued August 21, 1981	Hydrodesulfurizer Train III
<b><u>APC-81/0876-OPERATION</u></b> issued August 21, 1981	Hydrodesulfurizer Train IV
<b><u>APC-81/0877-OPERATION</u></b> issued August 21, 1981	Hydrodesulfurizer Train V
<b><u>APC-81/0832-OPERATION (Amendment 1)(HON)</u></b> issued October 23, 1997	Benzene Loading Facility
<b><u>APC-81/0833-OPERATION</u></b> issued February 24, 1982	Aromatics Fractionation and Storage Facility
<b><u>APC-82/0979-OPERATION</u></b> issued September 16, 1982	Nitrogen Grade Toluene Facility
<b><u>APC-81/0802-OPERATION</u></b> issued June 17, 1981	Heater Unit 32-H-101
<b><u>APC-95/0580-CONSTRUCTION (RACT)</u></b> issued September 6, 1995	Coker Naphtha Selective Hydrogenation Unit
<b><u>APC-81/0805-OPERATION</u></b> issued June 17, 1981	Heater Unit 33-H-1
<b><u>APC-81/0806-OPERATION</u></b> issued June 17, 1981	Heater Unit 33-H-2
<b><u>APC-81/0822-OPERATION (Amendment 1)</u></b> issued June 12, 1992	Olefins Plant
<b><u>APC-81/0808-OPERATION</u></b> issued June 17, 1981	Heater Unit 134-H-101
<b><u>APC-81/0966-OPERATION</u></b> issued September 9, 1981	Hydrocracker Unit and Process Heaters 36-H-1, 36-H-2, and 36-H-3
<b><u>APC-80/0869-OPERATION (Amendment 5)(VOC RACT)(NSPS)</u></b> issued November 4, 1999	Intermediate Product Tank Farm
<b><u>APC-80/0869-OPERATION (Amendment 4)(VOC RACT)(NSPS)</u></b> issued April 12, 1996	Intermediate Product Tank Farm
<b><u>APC-80/0870-OPERATION (Amendment 3)(VOC RACT)(NSPS)</u></b> issued March 29, 2000	Crude Oil Tank Farm
<b><u>APC-80/0870-OPERATION (Amendment 2)(VOC RACT)(NSPS)</u></b> issued October 12, 1994	Crude Oil Tank Farm
<b><u>APC-81/0120-OPERATION (Amendment 2)(RACT)</u></b> issued November 6, 1996	Sour Water Treatment Crude Unit
<b><u>APC-80/0868-OPERATION</u></b> issued April 30, 1980	Product Tank Farm

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<b><u>APC-80/0868-CONSTRUCTION/OPERATION (NSPS)(RACT)(MACT)</u></b> dated March 29, 2006	Ethanol Blending Project
<b><u>APC-91/0553-OPERATION (RACT)(MACT)</u></b> issued January 30, 1995	Ether Plant

**Table 6: 7 DE Admin. Code 1102 Permits Covered By Part 2**

7 DE Admin. Code 1102 Permit	Unit Description
<b><u>APC-81/283 OPERATION</u></b> issued January 14, 1981	Oil Recovery System
<b><u>APC-81/1008 OPERATION (Amendment 3)(NESHAP)</u></b> issued October 31, 2000	API/CPI Separators
<b><u>APC-81/1008-CONSTRUCTION/OPERATION (Amendment 4)(NESHAP)</u></b> issued February 22, 2001	API/CPI Separators
<b><u>APC-81/1009 OPERATION (Amendment 2)(NESHAP)</u></b> issued November 8, 1999	Equalization Tanks and Spill Diversion Tank
<b><u>APC-81/1009 OPERATION</u></b> dated June 17, 1981	Two second stage clarifiers and 2 second stage aeration tanks <sup>4</sup>
<b><u>APC-93/0350 CONSTRUCTION/OPERATION (Amendment 1)(NESHAP)</u></b> issued on June 25, 2001	Oily Water Sewer System
<b><u>APC-94/0710-OPERATION (NESHAP)(NOx RACT)</u></b> issued April 14, 1998	VCU
<b><u>APC-95/0862-OPERATION (Stage I)</u></b> issued April 28, 1995	Dual point Stage I Vapor Recovery System
<b><u>APC-95/0863-OPERATION (Stage II)</u></b> issued April 28, 1995	Healy Stage II Vapor Recovery System
<b><u>APC-95/0471-OPERATION (Amendment 2)(MACT)(RACT)</u></b> issued May 3, 2002	Marine Vapor Recovery System
<b><u>APC-81/0828 (A1)-OPERATION (Amendment 1)</u></b> issued June 29, 2007	Crude Unit
<b><u>APC-95/0570-OPERATION (Amendment 2)(LAER)(NSPS)</u></b> issued June 29, 2007	Crude Unit Atmospheric Heater 21-H-701
<b><u>APC-81/0784-CONSTRUCTION (Amendment 1)(NOx RACT)</u></b> issued April 25, 1996	Vacuum Tower Heater
<b><u>APC-81/0784-OPERATION</u></b> issued June 17, 1981	Vacuum Tower Heater
<b><u>APC-81/0963-OPERATION</u></b> issued August 12, 1981	coker Merox Plant
<b><u>APC-81/0785-OPERATION</u></b> issued June 17, 1981	various heaters
<b><u>APC-81/0829-OPERATION (Amendment 7)</u></b> issued June 4, 2008	Fluid Coker Unit, FCU Carbon Monoxide Boiler, Wet Gas Scrubber, and Selective Non-Catalytic Reduction System
<b><u>APC-82/1209-OPERATION (Amendment 3)</u></b> issued May 2, 2005	Coke and Flux Handling/Storage Facility
<b><u>APC-82/0981-OPERATION (Amendment 7)(NSPS)</u></b> issued June 30, 2008	Fluid Catalytic Cracking Unit (FCCU), FCCU Carbon Monoxide Boiler, and

<sup>4</sup> APC-81/1009 dated June 17, 1981 has 9 uncovered tanks listed in Appendix "A" of that permit. Of these 9 tanks, the 2 equalization tanks, 1 flocculator tank, 1 flash mix tank and 1 floatation clarifier have been included in subsequent NESHAP permits. Therefore the applicability of APC-81/1009 dated June 17, 1981 is restricted to the 2 second stage clarifiers and 2 second stage aeration tanks.

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	Wet Gas Scrubber Plus
<b><u>APC-81/0827-OPERATION (Amendment 1)(RACT)(NSPS)</u></b> issued January 30, 1995	Alkylation Merox Unit-Merox Treater
<b><u>APC-98/0522-OPERATION (RACT)(NSPS)</u></b> issued June 18, 2002	CHNT Heaters
<b><u>APC-98/0523-OPERATION (NSPS)(RACT)(NESHAP)</u></b> issued March 11, 2002	CNHT Unit, Butamer Unit, Alkylation Unit and cooling tower
<b><u>APC 81/0825-OPERATION</u></b> issued June 17, 1981	Catalytic Reformer Unit
<b><u>APC 82/0593-OPERATION</u></b> issued March 31, 1982	Polymerization Merox Plant
<b><u>APC-81/0826-OPERATION (Amendment 2)</u></b> issued August 22, 1991	Alkylation and Polymerization Units
<b><u>APC-98/0264-CONSTRUCTION/OPERATION (Amendment 7)(NSPS)</u></b> issued June 18, 2008	Sulfur Recovery Area and sulfur pit vapor recovery rerouting project
<b><u>APC-81/0965-OPERATION</u></b> issued September 9, 1981	Hydrogen Plant; and for the
<b><u>APC-81/0965-OPERATION (Amendment 1)(VOC RACT)</u></b> issued April 7, 2003	Hydrogen Plant Replacement of Low Temperature Shift Reactor Catalyst
<b><u>APC-82/073-OPERATION</u></b> issued February 8, 1985	CCR Reformer and Heater 42-H-1,2,3;
<b><u>APC-82/0073-OPERATION (Amendment 1)(MACT)</u></b> issued August 16, 2005	CCR Reformer and Hydrochloric Acid Wet Gas Scrubber
<b><u>APC-82/0632-OPERATION</u></b> issued February 8, 1985	CCR Reformer Reboiler Heater 42-H-7
<b><u>APC-81/0830-OPERATION</u></b> issued July 30, 1981	Flare System
<b><u>APC-95/0381-OPERATION</u></b> issued May 13, 1996	Spent Caustic Stripper
<b><u>APC-2005/0197-OPERATION (RACT)(MACT)(NSPS)</u></b> issued June 27, 2008	Tier II Gasoline Project

**Table 7: 7 DE Admin. Code 1102 Permits Covered By Part 3**

7 DE Admin. Code 1102 Permit	Unit Description
<b><u>APC-90/0288-OPERATION (Amendment 5) - Boiler 1</u></b> issued July 19, 2006	Boiler 1
<b><u>APC-90/0289-OPERATION (Amendment 6) - Boiler 2</u></b> issued July 19, 2006	Boiler 2
<b><u>APC-90/0290-OPERATION (Amendment 5) - Boiler 3</u></b> issued July 19, 2006.	Boiler 3
<b><u>APC-90/0288-OPERATION (Amendment 6)</u></b> issued December 16, 2008.	Boiler 1
<b><u>APC-90/0289-OPERATION (Amendment 7)</u></b> issued December 16, 2008	Boiler 2
<b><u>APC-90/0290-OPERATION (Amendment 6)</u></b> issued December 16, 2008.	Boiler 3
<b><u>APC-90/0291-OPERATION (Amendment 1)</u></b> issued December 16, 2008.	Boiler 4
<b><u>APC-97/0503-OPERATION (Amendment 5)(LAER)(NSPS)</u></b> issued December 16, 2008	Two combined cycle units, two duct burners, two heat recovery steam generators, two electric generators,
<b><u>APC-90/0291-OPERATION - Boiler #4</u></b> issued February 2, 1993	Boiler 4
<b><u>APC-97/0504-OPERATION</u></b> issued August 6, 2003	Gasifiers #1 & #2, two gas coolers,

7 DE Admin. Code 1102 Permit	Unit Description
	amine acid gas removal system, syngas flare - Unit 82, One 3-cell linear mechanical draft evaporative cooler – Emission Unit 50
<b><u>APC-97/0503-OPERATION (Amendment 3) (LAER)(NSPS)</u></b> issued July 19, 2006	Two combined cycle units, two duct burners, two heat recovery steam generators, two electric generators – Emission Unit 84.
<b><u>AQM-003/00016-CAIR</u></b> issued May 27, 2008	DCPP4 (Boiler No. 4)

### **RECENTLY ISSUED 7 DE ADMIN. CODE 1102 OPERATION PERMITS:**

The following **7 DE Admin. Code 1102** operation permits have been issued to the facility since the issuance of Title V Parts 1, 2 and 3 on May 27, 2008. No permits have been issued for Part 1 units during this period.

1. **Permit: APC-81/0829-Operation (Amendment 7)** for the Fluid Coking Unit (FCU), FCU COB, WGS and SNCR issued on June 4, 2008. [Part 2]
2. **Permit: APC-90/0264-Construction/Operation (Amendment 7)(NSPS)** for the SRA and Sulfur Pit Vapor Rerouting Project issued on June 18, 2008. [Part 2]
3. **Permit: APC-2005/0197-Operation (RACT)(MACT)(NSPS)** for the Tier 2 Gasoline project issued on June 27, 2008. [Part 2]
4. **Permit: APC-82/0981-Construction/Operation (Amendment 7)(NSPS)** for the Fluid Catalytic Cracking Unit (FCCU), FCCU COB, WGS System and Wet Gas sScrubber Plus issued on June 30, 2008. [Part 2]
5. **Permits: APC-90/0288-OPERATION (Amendment 6), APC-90/0289-OPERATION (Amendment 7), APC-90/0290-OPERATION (Amendment 6), APC-90/0291-OPERATION (Amendment 1), APC-90/0503-OPERATION (Amendment 5)(LAER)(NSPS)** issued December 16, 2008 for the purposes of qualifying for the exemption provided in . [Part 3]
6. **Permit: AQM-003/00016-CAIR** issued May 27, 2008 for DCPP4 (Boiler 4).

### **RECENTLY SUPERSEDED OR CANCELLED 7 DE ADMIN. CODE 1102 OPERATION PERMITS:**

The following **7 DE Admin. Code 1102** operation permits have been superseded or canceled since the issuance of Title V Parts 1,2 and 3 on May 27, 2008.

1. **APC-81/0829-OPERATION (Amendment 6)** issued June 29, 2007 for the Fluid Coker Unit, FCU Carbon Monoxide Boiler, Wet Gas Scrubber, and Selective Non-Catalytic Reduction System [Part 2]
2. **APC-82/0981-OPERATION (Amendment 6) (NSPS) Add 1** issued October 1, 2007 for the Fluid Catalytic Cracking Unit (FCCU), FCCU Carbon Monoxide Boiler, and Wet Gas Scrubber System [Part 2]
3. **APC-98/0264-CONSTRUCTION/OPERATION (Amendment67)(NSPS)** issued June 29, 2007 for the Sulfur Recovery Area. [Part 2]



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**Description of Modifications:**

This application for significant modifications contains request for administrative amendments, minor modifications and significant modifications. Tables 8, 9 and 10 below provide a summary of the requested modifications for Parts 1, 2 and 3 and are structured as follows:

1. Column 1 shows the relevant permit condition in the TV Part 2 permit;
2. Column 2 shows the existing permit condition;
3. Column 3 shows Premcor's proposed modification;
4. Column 4 provides Premcor's rationale for the proposed modification
5. Column 5 classifies the modification by type, i.e. whether the modification is administrative (A), minor (M) or significant (S)<sup>5</sup>; and
6. Column 6 provides AQM's comments

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<sup>5</sup> Significant modifications include modifications made to the permit to resolve outstanding appeals 2008-04, 2008-05 and 2008-06. These appeals have been stayed until DATE.

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**Table 8: Summary of Modifications – Part 1**

<b>Permit Citation</b>	<b>Current Title V Language</b>	<b>Proposed Title V Language</b>	<b>Reason for Requested Modification</b>	<b>Mod. Type</b>	<b>AQM Comments</b>
Condition 2(b)(4)	...Nothing in this permit shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations...	...Nothing in this permit shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations...	Correction of a typographical error. Administrative	A	Concur
Condition 2(b)(6)(i)	...[Reference Regulation No. 30 Section 6(g)(4) dated 12/11/00]	... [Reference Regulation No. 30 Section 6(g)(4) dated 12/11/00 and (6)(g)(5) dated 12/11/00]	Revision of the Permit language to make it consistent with similar requirements in other Title V Permits	A	Concur
Condition 2(b)(6)(ii)	... [Reference Regulation No. 30 Section 6(g)(5) dated 12/11/00]	... [Reference Regulation No. 30 Section 6(g)(4) dated 12/11/00 and (6)(g)(5) dated 12/11/00]	Revision of the Permit language to make it consistent with similar requirements in other Title V Permits	A	Concur
Condition 2(f)(3)(i)	Any information that the Department determines is reasonable necessary to evaluate or take final action on any permit application submitted in accordance with Condition 2(l) or 2(m) of this permit.	Any information that the Department determines is reasonably necessary to evaluate or take final action on any permit application submitted in accordance with Condition 2(l) or 2(m) of this permit.	Correction of a typographical error.	A	Concur
Condition 2(m)(5)(i)	...[Reference Regulation No. 30 Section 5(a)(1)(iv) dated 12/11/00]	...[Reference Regulation No. 30 Section 5(a)(1)(iv) dated 11/15/93]	Correction of a typographical error.	A	Concur
Condition 2(p)(2)	... as specified in Section 6.10 6 and required revisions as specified by Section 6.60(j) 6.1. <i>Note: State enforceable only. [Reference State of Delaware "Accidental Release Prevention Regulation" dated 1/11/99]</i>	... as specified in Section 6.10 and required revisions as specified by Section 6.60(j) 6.1. <i>Note: State enforceable only. [Reference State of Delaware "Accidental Release Prevention Regulation" as amended March 11, 2006]</i>	Correction of typographical errors.	A	Concur

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Condition 3, Table 1.a.1.ii.D	29-H-101 may combust either natural gas or desulfurized RFG. In addition, it may combust vapors displaced from benzene loading operations subject to the requirements in Condition 3, Table 1(ba) of this permit.	29-H-101 may combust either natural gas or desulfurized RFG. In addition, it may combust vapors displaced from benzene storage and loading operations subject to the requirements in Condition 3, Table 1(ba) of this permit.	Clarification of the Permit language	A	Concur
Condition 3, Table 1.bc.1.ii.B	In addition, the Company may combust vented vapors from the Alky Merox and Poly Merox processes and benzene vapors displaced from loading operations as described under Section ba.	In addition, the Owner/Operator may combust vented vapors from the Alky Merox and Poly Merox processes and benzene vapors displaced from storage and loading operations as described under Section ba.	Clarification of language	A	Concur
Condition 3, Table 1.bc.3.i.A	NO <sub>x</sub> emissions shall not exceed 0.2 lb/mmBtu.	NO <sub>x</sub> emissions shall not exceed 0.20 lb/mmBtu.	Correction of a typographical error. The NO <sub>x</sub> RACT limit is 0.20 lb/mmBtu.	A	Concur
Condition 3, Table 1.fe.1.vi.B	Quarterly reports of the rolling twelve month VOC emissions from Tank 471-TF-28.	Remove and mark as <b>[RESERVED]</b>	Correction of a typographical error. In the Memorandum issued by DNREC on April 8, 2008 (Comment Reference #11), DNREC agreed to revise this permit condition to require excess emissions to be reported on a semi-annual basis. Excess emissions are reported semi-annually in the Title V Semi-Annual Report.	A	Concur
Condition 3, Table 1.fg.1	<b>Odor Control.</b>	<b>Odor Control – State Enforceable Only.</b>	Addition of language specifying that these requirements are State Enforceable Only.	A	AQM disagrees. Odor control requirements are "state enforceable only" if they are based upon 7 DE Admin Code 1119.
Page 1	The Premcor Refining Group, Inc.	The Premcor Refining Group Inc.	Correction of a typographical error.	A	Concur
Page 1	(Operator) The Premcor Refining Group, Inc. 4550 Wrangle Hill Road Delaware City, Delaware 19706	(Operator) Valero Delaware City Refinery	Administrative language change	A	Concur

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Condition 3(b)(2)	<u>General Record Keeping Requirements</u> . The Owner/Operator shall record, at a minimum, all of the following information:	<u>General Record Keeping Requirements</u> . The Owner/Operator shall record all of the following information:	Revision of language to make it consistent with similar requirements in other Title V permits	S (Appeal)	AQM has revised this condition to make it consistent with the language developed for the model permit
Condition 3, Table 1.a.2a.i.A (Conditions 3, Table 1.bc.2.i.A, c.2.i, d.2.i & e.2.i contain similar language)	The Company shall not purchase for use and shall not use any fuel having a sulfur content greater than 1.0 percent by weight in emission units 29-H-101 and 29-H-2 through 29-H-9. <i>[Reference Regulation No. 8, Section 2.1 dated 5/9/85]</i>	Reference for Regulation 8 has been added to the relevant sections in the permit.	Removal of this permit condition because the NSPS Subpart J requirement to not burn fuel gas with an H <sub>2</sub> S content greater than 0.1 gr/dscf is more stringent.	S (Appeal)	AQM concurs that the NSPS requirement to not burn fuel gas with an H <sub>2</sub> S content greater than 0.1 gr/dscf is more stringent. However, this requirement (i.e., 1% S in fuel) is based on Regulation 8. Therefore it continues to be an applicable requirement. AQM has incorporated this requirement by adding the reference of Regulation 8 to relevant sections in the permit.
Condition 3, Table 1.ba.1.iv.B	The Company shall conduct leak inspection procedures in accordance with the requirements of 40 CFR 63.148 for storage tanks 331-TC-1, 332-TC-1 and 570-TC-10. <i>[Reference: 40 CFR Part 63, Section 63.148, 7/1/05 ed.]</i>	For the vapor collection system and storage tanks 331, 332, and 570 the company shall; 1. For each hard piped vapor collection system and closed vent system the Company shall conduct annual visual inspections for visible, audible, or olfactory indications of leaks 2. For each fixed roof, cover, and enclosure, the Company shall conduct semi-annual visual inspections for visible, audible, or olfactory indications of leaks. 3. Leaks indicated by visual inspections, shall be repaired as soon as practicable except as described in paragraph iv.B.4., below. A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. For leaks found in vapor collection systems used for transfer operations, repairs shall be completed no later than 15 days after the leak is	The conditions of 40 CFR 63.148 do not apply to these storage tanks. However, Premcor has agreed to conduct monitoring of the benzene storage in accordance with the proposed requirements.	S (Appeal)	AQM concurs and have added addition language in No. 2 to read, "For each fixed roof, cover, and enclosure, the Company shall conduct semi-annual visual inspections for visible, audible, or olfactory indications of leaks <u>as specified in 40 CFR Part 63 subpart G §63.133 through 63.137</u> ".

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		<p>detected or at the beginning of the next transfer operation, whichever is later.</p> <p>4. A delay of repair for which leaks have been detected is allowed if the repair is technically infeasible without a shutdown or if the Company determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. Repair of such equipment shall be complete by the end of the next shutdown.</p> <p>5. For each vapor collection system or closed vent system that contains by-pass lines that could divert a vent stream away from the control device and to the atmosphere, the Company shall:</p> <p>(a) install, calibrate, maintain and operate a flow indicator that determines whether the vent stream flow is present at least once every 15 minutes. The flow indicator shall be installed at the entrance to any by-pass line; or</p> <p>(b) secure the by-pass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection shall be performed at least once per month to ensure the valve is maintained in the closed position and the vent stream is not diverted through the by-pass line. Equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines and pressure relief valves needed for safety purposes are not subject to this paragraph.</p> <p>6. The Company shall record the information specified as follows:</p> <p>(a) Identification of all parts of the</p>			

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		<p>vapor collection system, closed vent system, fixed roof cover, or enclosure that are designated as unsafe to inspect and therefore exempt from iv.B.1. and iv.B.2 above.</p> <p>(b) Identification of all parts of the vapor collection system, closed vent system, fixed roof cover, or enclosure that are designated as difficult to inspect, and therefore exempt from iv.B.1. and iv.B.2 above, with an explanation of why the equipment is difficult to inspect, and the plan for inspecting the equipment.</p> <p>(c) for each vapor collection system or closed vent system that contains by-pass lines that could divert a vent stream away from the control device to the atmosphere, the Company shall keep a record of the following:</p> <p>(1) where a flow indicator is used, hourly records of whether the flow indicator specified in iv.B.5.(a). was operating and whether a diversion was detected at any time during the hour as well as records of all times of all periods when the vent stream is diverted or the flow indicator is not operating;</p> <p>(2) where a seal mechanism is used to comply with iv.B.5.(b). the Company shall record whether the monthly visual inspection of the seals or closure mechanisms has been done and record when the seal mechanism is broken, the bypass line valve position has changed, or the key for the lock-and-key has been checked out, and records of any car seal that has broken;</p> <p>(d) for each visual inspection</p>			

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		conducted in accordance with i.v.B.1. & B.2. during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. <i>[Reference Regulation 30 Section 6(a)(3)(i)(B) dated 12/11/00]</i>			
Condition 3, Table 1.i.1.ii	Compliance with the emission standard of this condition shall be demonstrated in accordance with Subsection 1.5(c) of Regulation No. 20 and the recordkeeping requirements of this condition.	Except for units where compliance with the visible emission standard is required to be demonstrated by an alternative monitoring plan, compliance with the Emission Standard of this condition shall be demonstrated in accordance with Subsection 1.5(c) of Regulation No. 20 and the recordkeeping requirements of this condition.	Revision of the permit language to make it consistent with similar requirements in other Title V Permits for the facility.	S (Appeal)	Concur
Condition 3, Table 1.i.1.iii.B	The Company shall conduct daily qualitative stack observations to determine the presence of any visible emissions when the unit is in operation.	The Owner/Operator shall conduct weekly qualitative observations to determine the presence of any visible emissions when the unit is in operation.	Revision of the permit language to make it consistent with similar requirements in other Title V Permits for the facility.	S (Appeal)	Concur
Condition 3, Table 1.i.3.iv	Recordkeeping: The Company shall keep a record of postings, and employee training related to these work practice standards and handling, storage, and disposal of VOCs. <i>[Reference Regulation No. 30 Section 6(a)(3)(i)(B) dated 12/11/00]</i>	Recordkeeping: The Company shall keep a record of postings, and employee training related to these work practice standards of handling, storage, and disposal of VOCs. <i>[Reference Regulation No. 30 Section 6(a)(3)(i)(B) dated 12/11/00]</i>	Revision of permit language to clarify the recordkeeping requirement	S (Appeal)	Concur
Condition 6	<b><u>Permit Shield...</u></b>	Permit shield has been included as an attachment	Does not provide the full permit shield contemplated by DE Reg. 30	S (Appeal)	Concur
Condition 3(b)	The Owner/Operator shall maintain all of the information required under Conditions 3(b)(1) and 3(b)(2) of this permit for a minimum of 5 years from such information's date of record.	Language has been made consistent with model permit.	Revision of the Permit language to make it consistent with similar requirements in other Title V Permits	M	AQM has revised this condition to make it consistent with the standard language developed for the model permit

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Condition 3(c)(3)(i)	Compliance with terms and conditions of this permit shall be certified...	Language has been made consistent with model permit.	Revision of the Permit language to make it consistent with similar requirements in other Title V Permits	M	AQM has revised this condition to make it consistent with the standard language developed for the model permit
Condition 3, Table 1.a.1.i, bc.1.i, c.1.i, d.1.i, e.1.i	Emission Standard: The Company shall not cause or allow the emission of particulate matter in excess of 0.3 lb/mmBTU heat input, maximum 2-hour average. <i>[Reference Regulation No. 4 Section 2.1 dated 2/1/81]</i>	No change	Include all Common Heater Requirements in Condition 3, Table 1.j	M	AQM does not agree that additional clarity will result by including a new section for Common Heater Requirements as suggested by Premcor.
Condition 3, Table 1.a.1.iv (Conditions 3, Table 1.bc.1.iv, c.1.iv, d.1.iv & e.1.iv contain similar language)	Monitoring/Testing: The Company shall continuously monitor and record the concentration (dry basis) of H <sub>2</sub> S in RFG before it is combusted in any fuel burning device. The monitoring instrument shall be located downstream of all process steps that increase the concentration of H <sub>2</sub> S in RFG prior to its being combusted in any fuel burning device. The H <sub>2</sub> S CEMS shall conform to the requirements of Performance Specification 7 of 40 CFR 60, Appendix "B" and comply with the Quality assurance requirements of 40 CFR 60, Appendix "F". The Relative Accuracy evaluations shall be conducted using Method 11 of 40 CFR 60, Appendix "A." <i>Reference: Regulation No. 30 Section 6(a)(3)(i)(B) dated 12/11/00]</i>	No change	This Monitoring/Testing requirement is listed in the requirements for SO <sub>2</sub> . See the Facility Wide Requirements in the Permit Mark-up.	M	AQM disagrees because it has structured the permit to clearly state all applicable requirements for each unit.



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Condition 3, Table 1.a.1.v (Conditions 3, Table 1.bc.1.v, c.1.v, d.1.v & e.1.v contain similar language)	Record Keeping: The Company shall maintain records of the fuel combusted in each unit.	Record Keeping: The following records shall be maintained in accordance with Condition 3(b): Records of the fuel combusted in each unit.	Clarification of the permit language to make it consistent with similar requirements in the Permit.	M	AQM has revised this condition to make it consistent with standard language developed for the model permit
Condition 3, Table 1.a.3.iii	A. For Unit 29-H-101: Upon written request of the Department, the Company shall submit a test protocol for periodic stack testing to demonstrate compliance.  B. For Units 29-H-2 through 29-H-9 and 29-H-101: None in addition to the annual tune up required in Compliance Method (B).	None	Condition 3(b)(1)(ii) includes the requirement that the Owner/Operator conduct testing upon request.  Removal of annual tune-up requirement for 29-H-101 because an annual tune-up is not required for this heater under DE Reg. 1112.	M	Concur
Condition 3, Table 1.a.3.iv.A	The company shall maintain the following records: A. All stack test data and results. B. A log of all tune-ups performed. C. Documentation of qualifications of personnel responsible for conducting the tune up.	None in addition to those listed in Condition 3(b).	The requirement to maintain stack test results is included in Condition 3(b).  Removal of annual tune-up requirement for 29-H-101 because an annual tune-up is not required for this heater under DE Reg. 1112.  Include all other Common Heater Requirements in Condition 3, Table 1.j.	M	Concur  Concur  AQM does not agree that additional clarity will result by including a new section for Common Heater Requirements as suggested by Premcor.

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Condition 3, Table 1.a.4, bc.4, c.4, d.4, e.4	Visible Emissions Standard:	No change	Include in Common Heater Requirements in Condition 3, Table 1.j.	M	AQM does not agree that additional clarity will result by including a new section for Common Heater Requirements as suggested by Premcor.
Condition 3, Table 1.ba.1.vi.D	Results of stack test required to demonstrate compliance with Operational Limitation B.	Remove and mark as <b>[RESERVED]</b>	The requirement for the submittal of stack test results is included in Condition 3(b)(1)(v).	M	Concur
Condition 3, Table 1.bb.1.v.A, 2.iv.A, 3.iv.A, 4.iv.A, 5.iv.A, 6.iv.A, 7.iv.A, 8.iv.A, 9.iv.A, 10.iv.A, 11.iv.A	All records and information required by this section shall be maintained in a manner that can be readily accessed at the plant site. <i>[Reference: Regulation 30, Section 6(a)(3) dated 12/11/00]</i>	Remove and mark as <b>[RESERVED]</b>	Similar condition listed in Condition 2(i)(2)	M	Concur
Condition 3, Table 1.bb.1.vi.A, 2.v.A, 3.v.A, 4.v.A, 5.v.A, 6.v.A, 7.v.A, 8.v.A, 9.v.A, 10.v.A, 11.v.A, 12.v.A	All records indicating exceedances of the standards in accordance with Conditions 2(b)(9) and 3(c)(2) of this permit.	Remove and mark as <b>[RESERVED]</b>	Reporting requirement is included in Condition 3(c)(2).	M	Concur
Condition 3, Table 1.bc.3.i.B	NO <sub>x</sub> emissions shall not exceed those achieved through an annual tune up performed by qualified personnel. <i>[Reference Reg. 12, Section 3.3(b) dated 11/24/93]</i>	Remove and mark as <b>[RESERVED]</b>	Removal of annual tune-up requirement for 32-H-101 because an annual tune-up is not required for this heater under DE Reg. 1112.	M	Concur

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Condition 3, Table 1.bc.3.ii.B	Compliance demonstration with Emission Standard (B) shall be by conducting an annual tune up performed by qualified personnel. The tune up for 32-H-101 shall be performed within a week of the annual stack test required by emission standard A. <i>[Reference Regulation No. 30 Section 6(a)(3)(ii) dated 12/11/00]</i>	Remove and mark as <b>[RESERVED]</b>	Removal of annual tune-up requirement for 32-H-101 because an annual tune-up is not required for this heater under DE Reg. 1112.	M	Concur
Condition 3, Table 1.bc.3.iv	The company shall maintain the following records: A. All stack test data and results. B. A log of all tune ups performed. C. Documentation of qualifications of personnel responsible for conducting the tune ups.	None in addition to those listed in Condition 3(b) of this permit.	The requirement to maintain stack test results is included in Condition 3(b).  Include all other Common Heater Requirements in Condition 3, Table 1.j.	M	Concur  AQM does not agree that additional clarity will result by including a new section for Common Heater Requirements as suggested by Premcor.
Condition 3, Table 1.c.3, d.3, e.3	Nitrogen Oxides (NO <sub>x</sub> ).	No change	Include all Common Heater Requirements in Condition 3, Table 1.j.	M	AQM does not agree that additional clarity will result by including a new section for Common Heater Requirements as suggested by Premcor
Condition 3, Table 1.c.1.vi	Reporting Requirement: All records indicating exceedances of the standard in accordance Condition 3(c)(2).	Reporting: None in addition to those listed in Condition 3(c)(2) of this permit.	Reporting requirement is included in Condition 3(c)(2).	M	Concur. AQM has revised this condition to make it consistent with the standard language developed for the model permit
Condition 3, Table 1.d.3.iii.B	Conduct a visible emissions evaluation after conclusion of the annual tune up in accordance with Condition 3 – Table 1.db.4.	<b>[RESERVED]</b>	Condition is included in Monitoring/Testing requirements for Visible Emissions	M	Concur
Condition 3, Table 1.fa	<b>Emission Unit 40: Refinery Tank Farm Units With External Floating Roofs with Double Seals Subject to 40 CFR part 63, Subpart CC and 40 CFR part 60, Subpart Ka: ...</b>	See Permit Mark-up for proposed revisions	Revisions to consolidate and clarify the applicable requirements for these tanks.	M	This section was revised to include the most recent revisions to 40 CFR part 63, Subpart CC and 40 CFR part 60, Subpart Ka

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Condition 3, Table 1.fb	<b>Emission Unit 40: Refinery Tank Farm Units With External Floating Roofs with Double Seals Subject to 40 CFR part 63, Subpart CC and 40 CFR part 60, Subpart Ka: ...</b>	See Permit Mark-up for proposed revisions	Revisions to consolidate and clarify the applicable requirements for these tanks.	M	This section was revised to include the most recent revisions to 40 CFR part 63, Subpart CC and 40 CFR part 60, Subpart Ka
Condition 3, Table 1.fc	<b>Emission Unit 40: Refinery Tank Farm Units With External Floating Roofs with Double and Single Seals Subject to Regulation 24, Section 30 and 40 CFR part 63, Subpart CC: ...</b>	See Permit Mark-up for proposed revisions	Revisions to consolidate and clarify the applicable requirements for these tanks.	M	This section was revised to include the most recent revisions to 40 CFR part 63, Subpart CC.

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Condition 3 - Table 1.fc.1.vii.E  And  Condition 3 - Table 1.fd.1.vii.B	The Company shall comply with the following semiannual excess emission reports: The reports shall be submitted to the Department by January 31 and July 31 of each calendar year with a summary of all excess emissions for the preceding semiannual period. The summary shall include: 1. The name and location of the facility; 2. The subject sources that caused the excess emissions; 3. The time and date of the first observation of the excess emissions; 4. The cause and expected duration of the excess emissions; 5. The estimated amount of emissions (expressed in the units of applicable emission limitation); and 6. The proposed corrective actions and schedule to correct the conditions causing the excess emission. <i>[Reference: 80/0870(A3) Cond. 10]</i>	Remove and mark as <b>[RESERVED]</b>	Excess emissions are reported semi-annually in the Title V Semi-Annual report in accordance with the requirements of Condition 3(c)(2) of this Permit.	M	Concur
Condition 3, Table 1.fe	<b>Emissions Unit 40: Refinery Tank Farm Units With Fixed Roofs Subject to 40 CFR part 63, Subpart CC and 40 CFR part 60, Subpart Ka: ...</b>	See Permit Mark-up for proposed revisions	Revisions to consolidate and clarify the applicable requirements for these tanks.	M	This section was revised to include the most recent revisions to 40 CFR part 63, Subpart CC and 40 CFR part 60, Subpart Ka

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Condition 3, Table 1.fe.1.ii.C	Proper operation of the Conservation Vent and Carbon Adsorption Bed of Tank 471-TF-28 shall be considered a necessary part of acceptable storage tank operation in accordance with the Notice of Conciliation Proceedings and Penalty dated February 10, 1989 signed by Acting Secretary John Hughes for the Department, R.G. Soelkhe for Star Enterprise and Robert A. Cap for Texaco Refining and Marketing, Inc. <i>[Reference: Star Enterprise's "Carbon Canister Monitoring at Offtest and Sour Water Tanks" submitted as Attachment "A" of Permit: APC-81/0120]</i>	Remove and mark as <b>[RESERVED]</b>	Requirement to ensure proper operation of the Carbon Adsorption Bed is included in Condition 3, Table 1.fg.1.i.G.	M	Concur
Condition 3, Table 1.fe.1.iii.C	Compliance with Operational Limitation (C) shall be demonstrated weekly by a H <sub>2</sub> S Draeger tube that displays a reading less than 10 ppm. <i>[Reference: Star Enterprise's "Carbon Canister Monitoring at Offtest and Sour Water Tanks" submitted as Attachment "A" of Permit: APC-81/0120]</i>	Remove and mark as <b>[RESERVED]</b>	Similar requirement is included in Condition 3, Table 1.fg.1.i.G.	M	Concur
Condition 3, Table 1.ff	<b>Emissions Unit 40: Refinery Tank Farm Units With Fixed Roofs Subject to Regulation 24, Section 31 and 40 CFR Part 63, Subpart CC: ...</b>	See Permit Mark-up for proposed revisions	Revisions to consolidate and clarify the applicable requirements for these tanks.	M	This section was revised to include the most recent revisions to 40 CFR part 63, Subpart CC.
Condition 3, Table 1.ff.1.ix.B	Deviations in the Semi-Annual title V Report of the rolling twelve month VOC emissions from Tank 047-TF-78.	Remove and mark as <b>[RESERVED]</b>	Requirement to report excess emissions in the Title V Semi-Annual Report is included in Condition 3(c)(2) of this Permit.	M	Concur

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Condition 3, Table 1.fg.1.v	In addition to those required by Condition 3(c)(2) of this permit, submit deviations in the Semi-Annual title V Report identified in the inspection(s) of Tank 470-TF-50 and the results of the inspection(s). A list of all corrective actions shall be included. The reports shall include proposed actions for problems that have not been resolved and provide a timetable for the Department's approval for corrections to be made. <i>[Reference: APC-81/0120].</i>	None in addition to those listed in Condition 3(c)(2) of this permit.	Excess emissions are reported semi-annually in the Title V Semi-Annual report in accordance with the requirements of Condition 3(c)(2) of this Permit.	M	Concur. AQM has revised this condition to make it consistent with the standard language developed for the model permit
Condition 3, Table 1.fi.1.ii	Compliance with the emission standard shall be based on the proper operation of the refrigeration vapor recovery system.	Compliance with the Emission Standard shall be based on the monitoring/testing and recordkeeping requirements.	Revision of language to be consistent with similar language for other sources.	M	AQM has revised this condition to make it consistent with the standard language developed for the model permit
Condition 3, Table 1.fi.1.iii.B	If visible emissions are detected during any daily qualitative survey of visible emissions or is observed at any other time, the Company shall take corrective action and/or conduct a visible emissions test using Reference Method 22. The observation period is 2 hours and shall be done according to Reference Method 22.	If visible emissions are detected during any daily qualitative survey of visible emissions or is observed at any other time, the Company shall take corrective action and/or conduct a visible emissions test using 40 CFR 60, Appendix A, Reference Method 22, dated 7/11/06. The observation period is 2 hours and shall be done according to Reference Method 22.	Revise language to be consistent with similar language for other flares.	M	Revise language to be consistent with the regulation.

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Permit Citation	Current Title V Language	Proposed Title V Language	Reason for Requested Modification	Mod. Type	AQM Comments
Condition 3, Table 1.fi.2.i	The Company shall not burn any fuel in the flare that contains H <sub>2</sub> S in excess of 0.1 grain/DSCF. <i>[Reference Regulation No. 20, Section 11 dated 11/27/85 and 40 CFR 60.104(a)(1) dated 10/17/2000 and Paragraph 24 and Attachment 2 of Civil Action No. H-01-0978, Heaters and Boilers Consent Decree between the USA, Plaintiff and the States of Delaware and Louisiana, and the Northwest Air Pollution Authority of the State of Washington, Plaintiff-Interveners versus Motiva Enterprises LLC, Defendant, entered on March 21, 2001]</i>	The Company shall not burn any fuel in the flare that contains H <sub>2</sub> S in excess of 0.1 grain/DSCF. <i>[Reference Regulation No. 20, Section 11 dated 11/27/85 and 40 CFR 60.104(a)(1) dated 10/17/2000]</i>	Removal of reference to a Consent Decree	M	Concur
Condition 3, Table 1.fj.1.ii	The leak detection and repair requirements to control fugitive VOC emissions from the Ethanol Project shall be in accordance with the requirements in 40 CFR 60, Subpart GGG for new and existing components in light liquid service and in accordance with 40 CFR Part 63 Subpart CC for new and existing components in light liquid Hazardous Air Pollutant (HAP) service. The leak detection and repair requirements to control fugitive emissions from the Ethanol Project shall be in accordance with the Consent Decree for both new and existing components in light liquid service. <i>[Reference: <b>80/0868-C/O Cond. No. 2.1.2]</b></i>	Remove and mark as <b>[RESERVED]</b>	LDAR requirements are included in the Facility Wide Section of the Part 2 Permit.	M	AQM concurs. The following language has been added: "Applicable requirements are detailed in <b>Permit: AQM-003/00016 – Part 2, Condition 3 – Table 1, in the section "Facility Wide Requirements for Fugitive VOC Emissions".</b> "



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Condition 3, Table 1.fj.1.iv.B	Compliance with the Emission Standard for new components in light liquid HAP service shall be based on compliance with the standards in 40 CFR 63.648. Compliance with the standards in 40 CFR 60, Subpart GGG shall be based on the test methods and procedures in 40 CFR 60.592.	Remove and mark as <b>[RESERVED]</b>	LDAR requirements are included in the Facility Wide Section of the Part 2 Permit.	M	AQM concurs. The following language has been added: "Applicable requirements are detailed in <b>Permit: AQM-003/00016 – Part 2, Condition 3 – Table 1, in the section "Facility Wide Requirements for Fugitive VOC Emissions".</b> "
Condition 3, Table 1.fj.1.v.A	Results of the rolling 12 month VOC emissions comprised of working and breathing losses from Tank 206-TF-112 and LDAR monitoring program pursuant to 40 CFR 60, Subpart GGG for existing components in light liquid service and in accordance with 40 CFR 63, Subpart CC for new components in light liquid service.	Results of the rolling 12 month VOC emissions comprised of working and breathing losses from Tank 206-TF-112.	LDAR requirements are included in the Facility Wide Section of the Part 2 Permit.	M	AQM concurs. The following language has been added: "Applicable requirements are detailed in <b>Permit: AQM-003/00016 – Part 2, Condition 3 – Table 1, in the section "Facility Wide Requirements for Fugitive VOC Emissions".</b> "
Condition 3, Table 1.fj.1.vi	Reporting: In addition to Condition 3(c)(2) of this permit, the Company shall submit the following reports:	Reporting: None in addition to those listed in Condition 3(c)(2) of this permit.	Deviations are reported in the Title V Semi-annual Report in accordance with the requirements of Condition 3(c)(2) of this Permit.  LDAR reporting requirements are included in the Facility Wide Section of the Part 2 Permit.	M	AQM concurs. The following language has been added: "Applicable requirements are detailed in <b>Permit: AQM-003/00016 – Part 2, Condition 3 – Table 1, in the section "Facility Wide Requirements for Fugitive VOC Emissions".</b> "
Condition 3, Table 1.i.1.iv	Observation records shall be maintained on site.	The following records shall be maintained in accordance with Condition 3(b): Records of daily qualitative emission observations and Method 9 evaluations when emissions are observed.	Revision of the permit language to make it consistent with similar requirements in other Title V Permits for the facility.	M	AQM has revised this condition to make it consistent with the language developed for the model permit and references Condition 3(b)
Condition 3, Table 1.i.1.v	Reporting Requirement: All records indicating exceedance of the standard in accordance with Condition 3(c)(2) of this permit.	Reporting: None in addition to those listed in Condition 3(c)(2) of this permit.	Reporting requirement is included in Condition 3(c)(2).	M	AQM has revised this condition to make it consistent with the standard language developed for the model permit and references Condition 3(b)

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Condition 3, Table 1.i.2.v	Reporting Requirement: All records indicating exceedance of the standard in accordance with Condition 3(c)(2) of this permit.	Reporting: None in addition to those listed in Condition 3(c)(2) of this permit.	Reporting requirement is included in Condition 3(c)(2).	M	AQM has revised this condition to make it consistent with the standard language developed for the model permit and references Condition 3(b)
Condition 3, Table 1.i.4	None	No change	Addition of the facility wide requirement that the Owner/Operator shall not burn fuel gas with a H <sub>2</sub> S concentration greater than 0.1 gr/dscf on a three-hour rolling average.	M	Premcor withdrew this proposal. AQM has not incorporated a common requirement for H <sub>2</sub> S in RFG. Instead, the original format of the TV permit has been preserved to include this applicable requirement for each specific unit.
Condition 3, Table 1.j	None	No change	Addition of new section for common heater requirements	M	AQM has not incorporated a common requirement for heaters. Instead, the original format of the TV permit has been preserved to include this applicable requirement for each specific unit
Table of Contents	None	<b>Condition 3, Table 1.j - Common Heater Requirements:</b> Process heaters 29-H-2 through 29-H-9, 29-H-101, 32-H-101, 33-H-1, 33-H-2, 36-H-1, 36-H-2 and 36-H-3; Emission Points 29-1 through 29-4, 32-1, 33-1, 33-2, 36-1 and 36-2	Addition of new section in Condition 3, Table 1 for common heater requirements	M	AQM has not incorporated a common requirement for heaters. Instead, the original format of the TV permit has been preserved to include this applicable requirement for each specific unit.
Condition 3, Table 1.fd	<b>Emissions Unit 40 – Refinery Tank Farm Units With Fixed Roofs Subject to 40 CFR Part 63, Subpart CC and 40 CFR Part 60, Subpart Kb: ...</b>	See Permit Mark-up for proposed revisions	Revisions to consolidate and clarify the applicable requirements for these tanks.	M	This section was revised to include the most recent revisions to 40 CFR part 63, Subpart CC and 40 CFR Part 60 Subpart Kb.

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Condition 3, Table 1.a.1.iii.A, bc.1.iii.A, c.1.iii.A, d.1.iii.A, e.1.iii.A	Compliance with the emission standard is based on compliance with the NSPS limit of 0.1 grain/dscf limit of H <sub>2</sub> S in RFG.	No change	Include in Common Heater Requirements and revise compliance method to be based on fuel type and quality. See Condition 3, Table 1.j.	M & Appeal	AQM has not incorporated a common requirement for H <sub>2</sub> S in RFG. Instead, the original format of the TV permit has been preserved to include this applicable requirement for each specific unit
Condition 3, Table 1.a.2a, bc.2, c.2, d.2, e.2	Sulfur Dioxide (SO <sub>2</sub> )	Remove and mark as <b>[RESERVED]</b>	Include SO <sub>2</sub> requirements in the Facility Wide section of the Permit.  Removal of the requirements for monitoring fuel gas streams per the Alternate Monitoring Plan for NSPS Subpart J. See Section 1.2 of the Application	S	Concur.
Condition 3, Table 1.a.2a.ii.A (Conditions 3, Table 1.bc.2.iii.C, c.2.iii.B, d.2.iii.B & e.2.iii.B contain similar language)	Compliance with Emission Standard (A) shall be based on the fuel type and quality. <i>[Reference: Regulation No. 30 Section 6(a)(3)(i)(B) dated 12/11/00]</i>	Remove condition.	Removal of this permit condition because the NSPS Subpart J requirement to continuously monitor the H <sub>2</sub> S content in the fuel gas is more stringent. See the Facility Wide section in the Permit Mark-up.	S	Concur

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Permit Citation	Current Title V Language	Proposed Title V Language	Reason for Requested Modification	Mod. Type	AQM Comments
Condition 3, Table 1.a.3.i.B	For Units 29-H-101 and Units 29-H-2 through 29-H-9: NO <sub>x</sub> emissions shall not exceed those achieved through an annual tune up performed by qualified personnel. <i>[Reference: Regulation 12, Section 3.3(b) dated 11/24/93]</i>	Remove and mark as <b>[RESERVED]</b>	Removal of tune-up requirement for 29-H-101 because compliance with the NO <sub>x</sub> emission standard is demonstrated by the installation of low NO <sub>x</sub> burner technology.  Include all other Common Heater Requirements in Condition 3, Table 1.j.	S	Concur.  AQM will not create separate
Condition 3, Table 1.a.3.ii.B	For Units 29-H-2 through 29-H-9 and 29-H-101: Compliance demonstration with Emission Standard (B) shall be by conducting an annual tune up of each unit by qualified personnel.	Remove and mark as <b>[RESERVED]</b>	Removal of tune-up requirement for 29-H-101 because compliance with the NO <sub>x</sub> emission standard is demonstrated by the installation of low NO <sub>x</sub> burner technology.  Include all Common Heater Requirements in Condition 3, Table 1.j	S	Concur  AQM has not incorporated a common requirement for heaters. Instead, the original format of the TV permit has been preserved to include this applicable requirement for each specific unit
Condition 3, Table 1.ff.1.vi.E	Compliance with the Emission Limitation in section (v) shall be demonstrated by using EPA's Tanks 3.1 Program or an updated equivalent methodology approved by the Department, using monthly liquid throughput and the monthly average vapor pressure obtained from weekly samples using ASTM Method D-5191. <i>[Reference: Permit: APC-80/0869(A5) Cond. No. 5]</i>	Compliance with the Emission Limitation in section (v) shall be demonstrated by using EPA's Tanks 3.1 Program or an updated equivalent methodology approved by the Department, using monthly liquid throughput and the vapor pressure obtained from monthly samples using ASTM Method D-5191. <i>[Reference: Permit: APC-80/0869(A5) Cond. No. 5]</i>	Reduce frequency of monitoring to monthly based on limited variability of the vapor pressure data that has been collected in the past. See Attachment 2.	S	Concur
Condition 3, Table 1.fi.2.ii	Compliance with the Emission Standard shall be based on monitoring.	Compliance with the Emission Standard shall be based on only combusting commercial grade propane in the flare.	Revision of requirements for fuel gas streams that are subject to NSPS Subpart J. See Section 1.2.	S	Concur

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Permit Citation	Current Title V Language	Proposed Title V Language	Reason for Requested Modification	Mod. Type	AQM Comments
Condition 3, Table 1.fi.2.iii	A one time measurement of the H <sub>2</sub> S content of the fuel shall be made for Copper Strip according to the approved Alternate Monitoring Program and EPA guidance. <i>Reference: Letter from Motiva dated 9/12/2001 to Judy Katz, Air Protection Division Director, US EPA Region 3]</i>	None in addition to those listed in Condition 3(b)(1)(ii) of this permit.	Removal of the requirements for monitoring fuel gas streams per the Alternate Monitoring Plan for NSPS Subpart J. See Section 1.2.	S	Concur
Condition 3, Table 1.fi.2.iv	The Company shall maintain results of the fuel sampling required by the Alternate Monitoring Plan. <i>[Reference: Letter from Motiva dated 9/12/2001 to Judy Katz, Air Protection Division Director, US EPA Region 3]</i>	None in addition to those listed in Condition 3(b) of this permit.	Removal of the requirements for monitoring fuel gas streams per the Alternate Monitoring Plan for NSPS Subpart J. See Section 1.2.	S	Concur
Condition 3, Table 1.i.1.iii.A	Visual observations in accordance with paragraph (C) below shall be conducted within one (1) week of the annual tune-up. <i>[Reference Reg. No. 30 Section 6(a)(3) dated 12/11/00]</i>	Remove and mark as <b>[RESERVED]</b>	Removal of monitoring requirement. No visible emissions have been observed from these sources during observations conducted in the past 3 years, and qualitative observations are conducted on a daily basis. See Attachment 2.	S	Concur
Condition 3, Table 1.i.4	None	Sulfur Dioxide (SO <sub>2</sub> )... (see Permit Mark-up)	Removal of the requirements for monitoring fuel gas streams per the Alternate Monitoring Plan for NSPS Subpart J. See Section 1.2.	S	Concur
Condition 3, Table 1.fi.1.iv.B	Recordkeeping: ...Records of maintenance performed on the unit.	Recordkeeping: ... <b>[RESERVED]</b>	Removal of recordkeeping requirement to be consistent with similar requirements for other sources.	S	Concur

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**Table 9: Summary of Modifications – Part 2**

<b>Permit Citation</b>	<b>Current Title V Language</b>	<b>Proposed Title V Language</b>	<b>Reason for Requested Modification</b>	<b>Mod Type</b>	<b>AQM Comments</b>
Condition 1	<b><u>Emission Units Identification.</u></b> <i>[Reference Regulation No. 30 Section 3(c)(1), dated 12/11/00]</i>	<b><u>Emission Units Identification.</u></b> <i>[Reference Regulation No. 30 Section 3(c)(1), dated 11/15/93]</i>	Correction of a typographical error.	A	Concur
Condition 1(b)	<b><u>Regulation No. 2 Permit Identification<sup>1</sup>.</u></b>	<b><u>Regulation No. 1102 Permit Identification<sup>1</sup>.</u></b>	Correction of a typographical error.	A	Concur
Condition 2 & Condition 3	<b><u>Condition 2. General Requirements</u></b> <b><u>Condition 3. Specific Requirements</u></b>	See Permit Mark-up for proposed revisions	Various corrections of typographical errors or revisions to make permit language consistent with other Title V Permits	A	AQM has revised this condition to make it consistent with the standard language developed for the model permit
Condition 3, Table 1.ad.1.ii	Operational Limitation: <i>[Reference: Permit: APC-95/0862-OI dated April 28, 1995 and Permit: APC-95/0862-OII]</i>	Operational Limitation: <i>[Reference: Permit: APC-95/0862-OI dated April 28, 1995 and Permit: APC-95/0863-OIII]</i>	Correction of a typographical error. Incorrect Permit Reference Listed.	A	Concur
Condition 3, Table 1.ad.1.ii.B.2	Then maximum dispensing rate is limited to 10 gallons or less per minute; and	The maximum dispensing rate is limited to 10 gallons or less per minute; and	Correction of a typographical error.	A	Concur

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Permit Citation	Current Title V Language	Proposed Title V Language	Reason for Requested Modification	Mod Type	AQM Comments
Condition 3, Table 1.ad.1.iv.	Monitoring/Testing: The following tests shall be carried out at the prescribed frequencies: [Reference: Permit: APC-95/0863-0II and Reg. No. 24, Section 36, dated 1/11/02] A. A pressure/decay leak test as described in Regulation 24, Section 36 paragraph (d)(1)(i)(A) once every five years. B. An annual Healy Aboveground Applications System Test. C. At least one representative from the Owner/Operator must have been trained to operate and maintain the Stage II Healy System in accordance with Regulation 24, Section 36 paragraph (c)(2). D. Personnel trained pursuant to Monitoring/Testing requirement (C) shall perform daily routine maintenance inspections in accordance with manufacturer's specifications.	Monitoring/Testing: [Reference: Permit: APC-95/0863-0II and Reg. No. 24, Section 36, dated 1/11/02] A. A pressure/decay leak test shall be conducted as described in Regulation 1124, Section 36 paragraph (d)(1)(i)(A) once every five years. B. An annual Healy Aboveground Applications System Test shall be conducted. C. At least one representative from the Owner/Operator must have been trained to operate and maintain the Stage II Healy System in accordance with Regulation 1124, Section 36 paragraph (c)(2). D. Personnel trained pursuant to Monitoring/Testing requirement (C) shall perform daily routine maintenance inspections in accordance with manufacturer's specifications.	Clarification of permit language and correction of typographical errors.	A	Concur
Condition 3, Table 1.da.2.ii	With the exception process off gas in units 22-H-3 and 22-H-4 only desulfurized RFG may be combusted in units 22-H-1, 22-H-2, 22-H-3 and 22-H-4.	With the exception of process off gas in units 22-H-3 and 22-H-4 only desulfurized RFG may be combusted in units 22-H-1, 22-H-2, 22-H-3 and 22-H-4.	Correction of a typographical error	A	Concur
Condition 3, Table 1.e.5.i.A	CO emissions from the FCCU WGS shall not exceed 500 ppm dry @ 0% O <sub>2</sub> on an hourly average, 200 ppm dry @ 0% O <sub>2</sub> on a rolling 365 day average, and 3768 TPY.	CO emissions from the FCCU WGS shall not exceed 500 ppm as a one hour average and 3768 TPY.	Correction of a typographical error. Emission standard is inconsistent with Reference Permit APC-82/0981 (A6-1).	A	Concur

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Permit Citation	Current Title V Language	Proposed Title V Language	Reason for Requested Modification	Mod Type	AQM Comments
Condition 3, Table 1.n.2	Spent Caustic Stripper:	No change	Addition of language specifying that these requirements are State Enforceable Only.	A	AQM disagrees. The applicable requirements for the spent caustic stripper were incorporated in a Regulation 2 permit which makes those requirements federally enforceable.
Page 1	Premcor Refining Group Inc.	The Premcor Refining Group Inc.	Correction of a typographical error.	A	Concur
Table of Contents	Condition 3-Table 1.g	Condition 3-Table 1.ga	Change of section heading due to addition of a new section.	A	Concur
Condition 3, Table 1.g.1.v	In addition to Condition 3(c)(2). ... A. The Owner/Operator shall comply with the following semi-annual excess emission reports... B. The Owner/Operator shall submit quarterly H <sub>2</sub> S CMS reports...	None in addition to those listed in Condition 3(c)(2) of this permit.	Excess emissions are reported in the Semi-Annual Title V Report.  Include the requirement to submit quarterly H <sub>2</sub> S CMS reports in the Facility Wide section of the permit.	S (Appeal)	Concur  Premcor withdrew this proposal. AQM has not incorporated a common requirement for H <sub>2</sub> S in RFG. Instead, the original format of the TV permit has been preserved to include this applicable requirement for each specific unit.
Condition 3, Table 1.ob.6.ii	Recordkeeping: The Company shall keep a record of postings, and employee training related to these work practice standards and handling, storage, and disposal of VOCs. <i>[Reference Regulation No. 30 Section 6(a)(3)(i)(B) dated 12/11/00]</i>	Recordkeeping: The Company shall keep a record of postings, and employee training related to these work practice standards of handling, storage, and disposal of VOCs. <i>[Reference Regulation No. 30 Section 6(a)(3)(i)(B) dated 12/11/00]</i>	Revision of permit language to clarify the recordkeeping requirement	S (Appeal)	Concur
Condition 6	<b><u>Permit Shield...</u></b>	Permit shield has been included as an attachment	Does not provide the full permit shield contemplated by DE Reg. 30	S (Appeal)	Concur



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Permit Citation	Current Title V Language	Proposed Title V Language	Reason for Requested Modification	Mod Type	AQM Comments
Condition 1 – Table 2	Secondary and tertiary treatment equipment (downstream of DNF), 1 <sup>st</sup> and 2 <sup>nd</sup> stage activated sludge, sand filtration and assorted sumps and equipment (listed as having “No emission points”)	Only fugitive emissions	Clarify that there are emissions from these sources	M	Concur
Condition 1 – Table 2	Refinery Gas Plant (listed as having “No emission points”)	Only fugitive emissions	Clarify that there are fugitive emissions from this unit	M	Concur
Condition 1 – Table 2	None	Tier 2 Project – Fugitives - Tier 2 Gasoline Project involving modifications, ancillary equipment and tie-ins, and relocation of certain existing equipment to the existing cracked naphtha hydrotreater (CNHT, Unit 25), the existing Selective Hydrogenation Unit at the Ether Plant (SHU, Unit 43), and the Diglycolamine system (DGA, Unit 24)	Incorporation of Tier 2 Gasoline Project equipment as an emission source	M	Concur
Condition 1 – Table 2	Alkylation Unit (listed as having “No emission Points”)	Only fugitive emissions	Clarify that there are fugitive emissions from this unit	M	Concur
Condition 1 – Table 2	Polymerization Unit (listed as having “No emission Points”)	Only fugitive emissions	Clarify that there are fugitive emissions from this unit	M	Concur
Condition 1(b)	Table of Regulation No. 1102 Permits	Recently issued Regulation 2 permits have been added to Condition 1 (b)	Revision of the table to include recently issued Regulation No. 1102 permits.	M	Concur
Condition 3, Table 1.aa.1.iv.A	The carbon adsorbers shall be monitored daily in accordance with the monitoring protocol in Attachment I to <u>APC-93/0350 (A 1)</u> , and by replacing the carbon immediately upon breakthrough. ... Attachment 2 to this permit specifies the location and size of each canister set.	The carbon adsorbers shall be monitored daily in accordance with the monitoring protocol in Attachment “D” of this permit and by replacing the carbon immediately upon breakthrough. ... Attachment D to this permit specifies the location and size of each canister set.	Inclusion of monitoring protocol as an attachment to the permit.	M	Concur
Condition 3, Table 1.aa.1.vi	Reporting: The Owner/Operator shall comply with the following Reporting requirements: A. Annual reports that updates the information required by 40 CFR § 61.357(a)(1) through (3).	Reporting: The Owner/Operator shall comply with the following Reporting requirements: A. Submit to the Department copies of the Quarterly and Annual reports sent to the US EPA in accordance with the requirements of 40 CFR Part 61,	Clarification and consolidation of the reporting requirements	M	Concur

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	<p>B. Quarterly certifications that all required inspections have been carried out in accordance with the requirements of Part 61, Subpart FF.</p> <p>C. Quarterly reports that include each occurrence when the carbon in a carbon adsorber system is not replaced in accordance with compliance methods A or B.</p> <p>D. Annual reports that summarize all inspections required by 40 CFR § 61.346 during which detectable emissions are measured or a problem (such as a broken seal, gap or other problem) that could result in benzene emissions is identified, including information about the repairs or corrective action taken.</p> <p>E. Compliance with the reporting requirements of A, B, C and D of this condition are satisfied by submitting to the Department copies of the quarterly and annual reports sent to the US EPA.</p>	<p>Subpart FF.</p> <p>B. [RESERVED]</p> <p>C. [RESERVED]</p> <p>D. [RESERVED]</p> <p>E. [RESERVED]</p>			
Condition 3, Table 1.ab.1.iv.A	<p>Compliance with emission standards A and B shall be demonstrated by following the monitoring protocol that is Attachment 1 to Permit: <u>APC-81/1008</u>. <i>[Reference: Permit: APC-81/1008]</i></p>	<p>Compliance with Emission Standards (A) and (B) shall be demonstrated by following the monitoring protocol that is Attachment "E" of this permit.</p>	<p>Inclusion of monitoring protocol as an attachment to the permit.</p>	M	Concur

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Condition 3, Table 1.ab.1.vii.A-C	<p>Reporting:  <i>[Reference: 40 CFR 61.357 dated 1/7/93]</i></p> <p>A. In accordance with Section 61.357(d)(8), the Owner/Operator shall submit an annual report that summarizes all inspections required by Sections 61.342 through 61.354 during which detectable emissions are measured or a problem (such as a broken seal, gap or other problem) that could result in benzene emissions is identified, including information about repairs or corrective action taken.</p> <p>B. Each occurrence when the carbon in any carbon adsorber is not replaced after breakthrough has occurred.</p> <p>C. A record for each test of no detectable emissions in accordance with 40 CFR 61.355(h).</p>	<p>Reporting:  <i>[Reference: 40 CFR 61.357 dated 1/7/93]</i></p> <p>A. Submit to the Department copies of the Quarterly and Annual reports sent to the US EPA in accordance with the requirements of 40 CFR Part 61, Subpart FF.</p> <p>B. [RESERVED]</p> <p>C. [RESERVED]</p>	Clarification and consolidation of the reporting requirements.	M	Concur
Condition 3, Table 1.ab.1.vii.D	D. Periods during API bay outages when a water seal is not established.	D. [RESERVED]	Deviations are included in the semi-annual Title V Report	M	Concur

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Condition 3, Table 1.ab.viii	Certification: In addition to those listed in Condition 3(c)(3) of this permit, the Owner/Operator shall retain a statement signed and dated by the Owner/Operator certifying that the closed vent system and control device is designed to operate at the documented performance level when the waste management unit vented to the control device is, or would be, operating at the highest load or capacity expected to occur. <i>[Reference: 40 CFR 61.356(f)(1) dated 1/7/93]</i>	Certification: None in addition to those listed in Condition 3(c)(3) of this permit.	This condition is correctly listed in Condition 3, Table 1.ab.vi.A as a recordkeeping requirement.	M	Concur
Condition 3, Table 1.ac.1.i	Emission Standard: The Owner/Operator shall not cause or allow the emission of particulate matter in excess of 0.3 lb/mm BTU heat input, maximum 2-hour average.	Emission Standard: The Owner/Operator shall not cause or allow the emission of particulate matter in excess of 0.3 lb/mm BTU heat input, maximum 2-hour average from the VCU.	Clarification of the permit language.	M	Concur
Condition 3, Table 1.ac.1.iii.A	Compliance with the emission standard shall be based on the fuel usage and quality.	Compliance with the Emission Standard shall be based on the fuel type and quality.	Revision of the permit language to make it consistent with similar requirements in the Permit.	M	Concur
Condition 3, Table 1.ac.1.v	Recordkeeping: The Owner/Operator shall maintain the rolling twelve month fuel usage by the VCU.	Recordkeeping: The following records shall be maintained in accordance with Condition 3(b): The type of fuel combusted in the VCU.	Revision of the permit language to make it consistent with similar requirements in the Permit.	M	Concur

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Condition 3, Table 1.ac.2.i	Operational Limitation: In addition to an inerting stream identified as Waste Stream "A" in Drawing No. B-VC-A05733-150, commercial grade, desulfurized propane shall be the only fuel fired in this unit. <i>[Reference: Regulation No. 30 Section 6(a)(3)(i)(B) dated 12/11/00 and Approval of NSPS Subpart J Alternate Monitoring Plans dated October 31, 2002].</i>	Operational Limitation: In addition to an inerting stream identified as Waste Stream "A" in Drawing No. B-VC-A05733-150, commercial grade, desulfurized propane shall be the only fuel fired in the VCU. <i>[Reference: Regulation No. 30 Section 6(a)(3)(i)(B) dated 12/11/00].</i>	Clarification of permit language and removal of requirement reference (see next line item).	M	Concur
Condition 3, Table 1.ac.2.iv.A	Recordkeeping: [Reference Regulation No. 30 Section 6(a)(3)(ii) dated 12/11/00 and Approval of NSPS Subpart J Alternate Monitoring Plans dated October 31 2002] The Owner/Operator shall maintain the following records: A. Type of fuel burned in the VCU.	Recordkeeping: Comply with Condition 3, Table 1.ac.1.iv.	Recordkeeping requirement (A) is listed in Condition 3, Table 1.ac.1.iv.	M	Concur
Condition 3, Table 1.ac.3.i.B	The VCU shall be maintained and operated in accordance with the manufacturer's specifications.	[RESERVED]	Similar condition listed in Condition 3, Table 1.ob.4.i	M	Concur
Condition 3, Table 1.ac.3.v.A	Recordkeeping: [Reference: Regulation No. 30 Section 6(a)(3)(ii) dated 12/11/00] The Owner/Operator shall maintain the following records: A. Fuel usage.	Recordkeeping: The following records shall be maintained in accordance with Condition 3(b): A. Fuel usage of the VCU.	Clarification of the recordkeeping requirements.	M	Concur
Condition 3, Table 1.ac.4.i	Emission Standard: VOC emissions shall not exceed 20 ppmv (dry) corrected to 3 percent O <sub>2</sub> and 0.28 tons in any rolling twelve month period.	Emission Standard: VOC emissions shall not exceed 20 ppmv (dry) corrected to 3 percent O <sub>2</sub> and 0.28 tons in any rolling twelve month period from the VCU.	Clarification of permit language	M	Concur

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Condition 3, Table 1.ac.4.iv	None	D. Compliance with Operational Limitation (C) shall be based on Recordkeeping. E. Compliance with the Equipment Standard shall be based on Recordkeeping.	Addition of Compliance Methods for Operational Limitation and Equipment Standard.	M	Concur
Condition 3, Table 1.ac.4.vi.D	Maintain continuous records of the temperature of the gas stream in the combustion zone of the VCU and record of all three (3) hour periods of operation during which the average temperature of the gas stream in the combustion zone is more than 28°C below the combustion zone temperature.	Maintain continuous records of the temperature of the gas stream in the combustion zone of the VCU and record of all three (3) hour periods of operation during which the average temperature of the gas stream in the combustion zone is more than 28°C (50°F) below the combustion zone temperature.	Clarification of permit language.	M	Concur

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Condition 3, Table 1.ac.4.vii	<p>In addition to those required by Condition 3(c) of this permit, the Owner/Operator shall submit the following reports:</p> <p>A. In accordance with Section 61.357(c)(8), the Owner/Operator shall submit an annual report that summarizes all inspections required by Sections 61.342 through 61.354 during which detectable emissions are measured or a problem (such as a broken seal, gap or other problem) that could result in benzene emissions is identified, including information about repairs or corrective action taken.</p> <p>B. Quarterly reports outlining each three (3) hour period of operation during which the average temperature of the gas stream in the combustion zone of the VCU, as measured by the temperature monitoring device, is more than 50°F (28°C) below the design combustion zone temperature of 1300°F (704°C).</p>	<p>A. Submit to the Department copies of the Quarterly and Annual reports sent to the US EPA in accordance with the requirements of 40 CFR Part 61, Subpart FF.</p> <p>B. [RESERVED]</p>	Clarification and consolidation of the reporting requirements	M	Concur

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Condition 3, Table 1.ac.4.viii	In addition to those listed in Condition 3(c)(3) of this permit, the Owner/Operator shall retain a statement signed and dated by the Owner/Operator certifying that the closed vent system and control device is designed to operate at the documented performance level when the waste management unit vented to the control device is, or would be, operating at the highest load or capacity expected to occur. <i>[Reference: 40 CFR 61.356(f)(1) dated 1/7/93.]</i>	None in addition to those listed in Condition 3(c)(3) of this permit.	Reclassification of this requirement as a recordkeeping requirement. See Condition 3, Table 1.ac.4.vi.E of the Permit Mark-up.	M	Concur
Condition 3, Table 1.ac.5 (Conditions 3, Table 1.c.7, db.2, g.7, j.9, k.6 & m.4 contain similar language)	Visible emissions:	No change	Include visible emissions requirements in the Facility Wide section of the Permit	M	AQM has not incorporated a common requirement for visible emissions. Instead, the original format of the TV permit has been preserved to include this applicable requirement for each specific unit.
Condition 3, Table 1.ad.1.ii.B.3	Model 200 nozzles shall be used with the Model 100 Jet Pump.	Model 200 nozzles or upgraded nozzles shall be used with the Model 100 Jet Pump.	Model 200 nozzles have been discontinued by the manufacturer.	M	Concur
Condition 3, Table 1.ad.1.v.A.3	Daily records showing the quantity of gasoline delivered to the site.	Daily records showing the quantity of gasoline transferred to the gasoline storage tank.	Revision of the permit language since gasoline is produced on site and transferred to the storage tank.	M	Concur
Condition 3, Table 1.ad.1.vi.A.1	Report excess emissions to the Department's Underground Storage Tank Branch.		All excess emissions are reported to DNREC via the hotline per Condition 3(c)(2) of the permit.	M	Concur



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Condition 3, Table 1.b.1.i.B (Conditions 3, Table 1.da.1.i.F, e.1.i.E, g.1.i.B, j.1.i.G & n.1.i.A contain similar language)	At all times, including periods of startup, shutdown, and malfunction, the Owner/Operator shall maintain and operate the equipment and processes covered by this Permit, including all structural and mechanical components of all equipment and processes and all associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions. [Reference: Regulation No. 30 Section 6(a)(3)(i)(B) dated 12/11/00]	[RESERVED]	Similar condition is listed in Condition 3, table 1.ob.4.i of this permit.	M	Concur
Condition 3, Table 1.b.1.ii.B (Conditions 3, Table 1.da.1.ii.B, e.1.ii.B, g.1.ii.B, j.1.ii.D & n.1.ii.A contain similar language)	Compliance with operational limitation B shall be based on information available to the Department concerning the Owner/Operator's actions with respect to such events, and shall include the Department's review of all available facts and circumstances, including, but not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.	[RESERVED]	Similar condition listed in Condition 3, Table 1.ob.4.ii.A	M	Concur
Condition 3, Table 1.b.1.iii	The Owner/Operator shall monitor the fuel flow to the MVR VCU continuously.	The Owner/Operator shall monitor the fuel usage of the MVR VCU continuously.	Clarification of permit language	M	Concur
Condition 3, Table 1.b.1.iv	Recordkeeping: The Owner/Operator shall maintain a record of the type of fuel burned in the MVR VCU and hourly fuel flows.	Recordkeeping: The following records shall be maintained in accordance with Condition 3(b): The type of fuel combusted in the MVR VCU and hourly fuel usage.	Clarification of permit language	M	Concur

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Condition 3, Table 1.b.2.ii.A (Conditions 3, Table 1.e.2.iii.A, k.2.ii.A & m.2.ii.A contain similar language)	Compliance with the Emission Standard shall be based on compliance with Condition 3, Table 1b.1.i. A.	Compliance with the Emission Standard shall be based on the fuel type and quality.	Revision of the permit language to make it consistent with similar requirements in the permit.	M	Concur
Condition 3, Table 1.b.3.iv	Owner/Operator shall maintain all stack test results in accordance with Condition 3(b).	Comply with "Conditions Applicable to Multiple Pollutants" in Condition 3, Table 1.b.1.iv.	Similar condition listed in Condition 3(b)(2) of this permit.	M	Concur
Condition 3, Table 1.b.3.v	In addition to those required by Condition 3(c)(2) of this permit, the Owner/Operator shall submit a report of the stack test results within 90 days of completion of the test. <i>[Reference: Regulation No. 30 Section 6(a)(3)(iii) dated 12/11/00].</i>	None in addition to those required by Condition 3 (c)(2) of this permit.	Requirement for the submission of stack test reports is included in Condition 3(b)(1).	M	AQM has revised this condition to make it consistent with the standard language developed for the model permit and references Condition 3(b)
Condition 3, Table 1.b.4.iv	Owner/Operator shall maintain all stack test results in accordance with Condition 3(b).	Comply with "Conditions Applicable to Multiple Pollutants" in Condition 3, Table 1.b.1.iv.	Similar condition listed in Condition 3(b)(2) of this permit.	M	Concur
Condition 3, Table 1.b.4.v	In addition to those required by Condition 3(c)(2) of this permit, the Owner/Operator shall submit a report of the stack test results within 90 days of completion of the test. <i>[Reference: Regulation No. 30 Section 6(a)(3)(iii) dated 12/11/00].</i>	None in addition to those required by Condition 3(c)(2) of this permit.	Requirement for the submission of stack test reports is included in Condition 3(b)(1).	M	

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Condition 3, Table 1.b.5.v.A&B	Recordkeeping: ... A. Fuel usage in the VCU's on a rolling 12 month basis. B. Stack test results.	Recordkeeping: ... A. [RESERVED] B. [RESERVED]	Requirement to maintain fuel usage records is included in Condition 3, Table 1.b.1.iv. Requirement for the submission of stack test reports is included in Condition 3(b)(1).	M	Concur
Condition 3, Table 1.b.6.iv	The Owner/Operator shall maintain the following records in accordance with Condition 3(b): A. Daily visible emission record each day the MVR VCU's are operated. B. Method 9 observations.	The following records shall be maintained in accordance with Condition 3(b): Records of daily qualitative emission observations and Method 9 evaluations when emissions are observed.	Revision of the permit language to make it consistent with similar requirements in the permit.	M	Concur
Condition 3, Table 1.c.1.iii.A.2	Fuel usage by 21-H-701 and 21-H-2 data capture representing 90% of the Process Heaters' daily operating hours shall be considered continuous monitoring of fuel usage.	Monitor the fuel usage of 21-H-701 and 21-H-2.	Revision of the permit language to make it consistent with similar requirements in the permit.	M	Concur
Condition 3, Table 1.c.1.iv.C	None	Type of fuel combusted in 21-H-701 & 21-H-2 and fuel usage.	Revision of the permit language to make it consistent with similar requirements in the permit.	M	Concur
Condition 3, Table 1.c.2.i.A	For 21-H-701 and 21-H-2: The...	For 21-H-2: The...	Requirement is only applicable to 21-H-2 because there is a more stringent particulate matter emission limit for 21-H-701 listed in Emission Standard (B) of this section.	M	Concur
Condition 3, Table 1.c.2.ii.B	21-H-701 may combust process vent gas from the Merox system oxidizer column 21-C-104. <i>[Reference Civil Action H-01-0978 (S.D. Tex.) Entered on March 21, 2001 and Regulation No. 30 Section 6(a)(3)(ii) dated 12/11/00]</i>	21-H-701 may combust process vent gas from the Merox system oxidizer column 21-C-104. <i>[Regulation No. 30 Section 6(a)(3)(ii) dated 12/11/00]</i>	Remove reference to a Consent Decree	M	Concur

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Condition 3, Table 1.c.2.iii.A	Compliance with the emission standards A and B shall be based on the stack test based emission factor and the rolling 12 month fuel usage [Reference: <u>APC-95/0570 (A2)</u> ]	Compliance with Emission Standard (B) shall be based on the stack test based emission factor and the rolling 12 month fuel usage. Compliance with Emission Standard (A) shall be based on the fuel type and quality. [Reference: <u>APC-95/0570 (A2)</u> ]	Clarification of permit language because there is currently no stack testing requirement for 21-H-2.	M	Concur
Condition 3, Table 1.c.2.iv.A&B	Monitoring/Testing: ... A. The Owner/Operator shall monitor fuel usage continuously. Data capture representing 90% of the Process Heaters' daily operating hours shall be considered continuous monitoring of fuel usage. B. The Owner/Operator shall continuously monitor the H <sub>2</sub> S content in the RFG.	Monitoring/Testing: ... A. <b>[RESERVED]</b> B. No change	Requirement to monitor fuel usage is included in Condition 3, Table 1.c.1.iii.A.2.  Include requirement to monitor the H <sub>2</sub> S content in the RFG in the Facility Wide requirements.	M	Concur  Premcor withdrew this proposal. AQM has not incorporated a common requirement for H <sub>2</sub> S in RFG. Instead, the original format of the TV permit has been preserved to include this applicable requirement for each specific unit.
Condition 3, Table 1.c.2.v	The Owner/Operator shall maintain the following records: [Reference: Permit: APC-95/0570 (A2) and Regulation No. 30 Section 6(a)(3)(ii) dated 12/11/00] A. Rolling 12 month heat input calculated from the hourly fuel gas flow and the HHV obtained from daily sampling. B. H <sub>2</sub> S in RFG as recorded by CMS C. Monitoring data required by the AMP. D. Periods of operation when Merox vent gas from 21-C-104 is combusted in 21-H-701. E. Stack test results.	Comply with "Conditions Applicable to Multiple Pollutants" in Condition 3, Table 1.c.1.iv.	These recordkeeping requirements are listed elsewhere in the Permit.	M	The requirement to monitor the H <sub>2</sub> S content in RFG continuously has been moved to Condition 3 Table 1.c.3.iii.A.

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Condition 3, Table 1.c.3.i.A (Conditions 3, Table 1.da.1.i.B, e.1.i.A, g.1.i.E, j.1.i.C, k.1.i.C, & m.1.i.D contain similar language)	Except as allowed by Operational Limitation 2.ii.A. above, the Owner/Operator shall not burn in any fuel gas combustion device any fuel gas that contains H <sub>2</sub> S in excess of 0.1 grain/DSCF on a three hour rolling average. [Reference Regulation No. 20, Section 11 dated 11/27/85 and 40 CFR 60.104(a)(1) dated 10/17/2000]	No change	Include in the Facility Wide section of the permit.	M	Premcor withdrew this proposal. AQM has not incorporated a common requirement for H <sub>2</sub> S in RFG. Instead, the original format of the TV permit has been preserved to include this applicable requirement for each specific unit.
Condition 3, Table 1.c.3.ii.A	Compliance with Emission Standard A shall be based on the H <sub>2</sub> S CEMS for the RFG and on the monitoring requirements required by the AMP.	No change	Include in the Facility Wide section of the permit.	M	Premcor withdrew this proposal. AQM has not incorporated a common requirement for H <sub>2</sub> S in RFG. Instead, the original format of the TV permit has been preserved to include this applicable requirement for each specific unit.
Condition 3, Table 1.c.3.iii (Conditions 3, Table 1.da.iii.A, e.1.iii.A, g.1.iii.C, j.1.iii.A, k.1.iii.C & m.1.iii.C contain similar language)	Monitoring/Testing: ... A. The H <sub>2</sub> S content in RFG shall be continuously monitored using CMS. B. The H <sub>2</sub> S CMS shall comply with Performance Specification 7 of 40 CFR 60, Appendix "B". C. Quality Assurance requirements for the H <sub>2</sub> S CMS shall be in accordance with the procedures described in 40 CFR 60, Appendix "F".	No change	Include in the Facility Wide section of the permit.	M	Premcor withdrew this proposal. AQM has not incorporated a common requirement for H <sub>2</sub> S in RFG. Instead, the original format of the TV permit has been preserved to include this applicable requirement for each specific unit.

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Condition 3, Table 1.c.3.iv.A	Recordkeeping: ... Fuel usage, rolling average 12 month sulfur content as measured by H <sub>2</sub> S CEMS and all H <sub>2</sub> S CEMS calibration, maintenance, quarterly cylinder gas audits and annual relative accuracy test audits.	No change	Requirements to maintain fuel usage and H <sub>2</sub> S CMS data are included in other sections of the permit.	M	Premcor withdrew this proposal. AQM has not incorporated a common requirement for H <sub>2</sub> S in RFG. Instead, the original format of the TV permit has been preserved to include this applicable requirement for each specific unit.
Condition 3, Table 1.c.4.iv.A	Recordkeeping: ... All periods of exceedances of the emission standards.	[RESERVED]	Similar condition included in Condition 3(b) of the permit.	M	Concur
Condition 3, Table 1.c.4.v.A	Quarterly reports for the preceding quarter shall be submitted to the Department by January 31, April 30, July 31 and October 31 of each calendar year with the following information: 1. For 21-H-2, A summary of all NO <sub>x</sub> excess emissions for the quarter including the name and location of the facility; the permitted source(s) that caused the excess emissions; the time and date and the first observance of the excess emissions; the cause, estimated rate, and corrective actions to prevent re-occurrence. 2. For 21-H-701 a CEMS report in a form approved by the Department;	[RESERVED]	Excess emissions are included in the semi-annual Title V Report	M	Concur
Condition 3, Table 1.c.5.iii.A	The Owner/Operator shall monitor fuel usage continuously.	[RESERVED]	Requirement is included in another section of the permit.	M	Concur

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Condition 3, Table 1.c.5.iv	The Owner/Operator shall maintain the following records: [Reference: Permit:APC-95/0570 (A2) and Regulation No. 30 Section 6(a)(3)(ii) dated 12/11/00] A. Rolling twelve month fuel usage. B. Stack test results.	Comply with "Condition Applicable to Multiple Pollutants" in Condition 3, Table 1.c.1.iv.	Requirements are included in other sections of the permit.	M	Concur
Condition 3, Table 1.c.6.i.B (Conditions 3, Table 1.da.6.i.B & e.6.i.B contain similar language)	The leak detection and repair requirements to control fugitive VOC emissions from the Crude Unit shall be in accordance with ...	No change	Include in the Facility Wide Section of the permit.	M	AQM disagrees. The LDAR requirements in the Reg 2 permit are more stringent than those covered under the facility wide section of the permit.
Condition 3, Table 1.c.6.ii (Conditions 3, Table 1.da.6.ii & e.6.ii contain similar language)	A. There shall be no emissions of uncondensed VOCs from the condensers, hot wells or accumulators of any vacuum producing system. B. The Owner/Operator shall provide for the following during process unit turnarounds. 1. Depressurization venting of the process unit or vessel to a vapor recovery system, flare or firebox 2. No emission of VOC from a Process unit or vessel until its internal pressure is 136 kiloPascals (kPa) (19.7 pounds per square inch atmospheric [psia]) or less.	[RESERVED]	Include in the Facility Wide Section of the permit.	M	Concur

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Condition 3, Table 1.c.6.ii.B (Conditions 3, Table 1.da.6.ii.B & e.6.ii.B&C contain similar language)	B. Compliance with the emission standard B shall be based on the standards in 40 CFR subpart GGG and 40 CFR Part 63 subpart CC, as applicable. Compliance with the standards in 40 CFR subpart GGG shall be based on the test methods and procedures in 40 CFR 60.592 and compliance with the requirements of 40 CFR Part 63 subpart CC shall be based on the standards in 40 CFR 63.648.	No change	Include in the Facility Wide Section of the permit.	M	AQM disagrees. The LDAR requirements in the Reg 2 permit are more stringent than those covered under the facility wide section of the permit.
Condition 3, Table 1.c.6.ii.C (Conditions 3, Table 1.da.6.ii.C&D & e.6.ii.C&D contain similar language)	C. Compliance with the Operational Limitation B shall be based on either piping the uncondensed vapors to a firebox or incinerator. Alternately, the vapors may be compressed and added to the refinery fuel gas. During process unit turnarounds, the Owner/Operator shall conduct depressurization venting of the process unit or vessel to a vapor recovery system, flare or firebox. The Owner/Operator shall monitor the pressure in each process or vessel until its internal pressure is 136 kPa or less.	C. [RESERVED]	Include in the Facility Wide Section of the permit.	M	Concur
Condition 3, Table 1.c.6.iii.A	The Owner/Operator shall monitor fuel usage continuously.	[RESERVED]	This requirement is included in another section of the permit.	M	Concur



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Condition 3, Table 1.c.6.iv	<p>The Owner/Operator shall maintain the following records: [Reference: Permit:APC-95/0570 (A2) and Regulation No. 30 Section 6(a)(3)(ii) dated 12/11/00]</p> <p>A. Rolling twelve month fuel usage.</p> <p>B. Stack test results.</p> <p>C. VOC leak repair records required by 40 CFR 60.592 for existing components in light liquid and gaseous service and 40 CFR 63.654 for new components in light liquid and gaseous service.</p> <p>D. Date of process unit or vessel turnarounds and the internal pressure of the process unit or vessel immediately prior to venting to the atmosphere.</p>	Comply with "Conditions Applicable to Multiple Pollutants" in Condition 3, Table 1.c.1.iv.	Requirements are included in other sections of the permit.	M	Concur

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Condition 3, Table 1.da.1.v.B	Quarterly CEMS reports for the preceding quarter shall be submitted to the Department for the CEMS required by this permit by January 31, April 30, July 31 and October 31 of each calendar year and shall include a report of excess emissions, quarterly audit results, data capture for the period and details of out of control periods.	Quarterly NO <sub>x</sub> , SO <sub>2</sub> & CO CEMS reports for the preceding quarter shall be submitted to the Department by January 31, April 30, July 31 and October 31 of each calendar year and shall include the following:  <ol style="list-style-type: none"> <li>1. Excess emissions and the nature and cause of the excess emissions, if known. The summary shall consist of emission averages, in the units of the applicable standard, for each averaging period during which the applicable standard was exceeded.</li> <li>2. The date and time identifying each period during which the continuous monitoring system was inoperative, except for zero and span checks, and the nature of system repairs or adjustments.</li> <li>3. When no excess emissions have occurred and the CEMS have not been inoperative, repaired, or adjusted, such information shall be included in the report.</li> </ol>	Revision of permit language to make it consistent with DE Reg. 1117 requirements	M	Concur
Condition 3, Table 1.da.2.iii.A	Compliance with the emission standard A, is based on compliance with the NSPS limit of 0.1 grain/dscf limit of H <sub>2</sub> S in RFG.	Compliance with Emission Standard (A) shall be based on the fuel type and quality.	Revision of permit language to make it consistent with similar conditions in the permit.	M	Concur
Condition 3, Table 1.da.6.iv.B (Condition 3, Table 1.e.6.iv.B contains similar language)	VOC leak repair records required by 40 CFR 60.592 for existing components in light liquid and gaseous service and 40 CFR 63.654 for new components in light liquid and gaseous service. <i>[Reference Permit: APC 81/0829 (A6)]</i>	No change	Include requirement in the Facility Wide section of the permit.	M	AQM disagrees. The LDAR requirements in the Reg 2 permit are more stringent than those covered under the facility wide section of the permit.

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Condition 3, Table 1.da.6.v.B (Condition 3, Table 1.e.6.v.B contains similar language)	Leak detection and repair reports shall be submitted as required by 40 CFR 60.592 for existing components in light liquid and gaseous service and 40 CFR 63.654 for new components in light liquid and gaseous service. [Reference Permit: APC-81/0829 (A6)]	No change	Include requirement in the Facility Wide section of the permit.	M	AQM disagrees. The LDAR requirements in the Reg 2 permit are more stringent than those covered under the facility wide section of the permit.
Condition 3, Table 1.e.10.i.B	The Owner/Operator shall not cause or allow the emission of visible air contaminants and/or smoke from the FCCU WGS stack, the shade or appearance of which is greater than 30 percent opacity, except for one 6 minute average opacity reading in any 1 hour period. <i>[Reference 40 CFR Part 60, Subpart J, §60.102(a)(2) and Regulation No20 .Section 11 dated 11/27/85].</i>	Reference has been modified to include the NSPS citation.	Removal of Emission Standard because Condition 3, Table 1.e.10.i.A is more stringent.	M	AQM concurs that the standard in Condition 3, Table 1.e.10.i.A is more stringent than the NSPS requirement in this condition. However, the NSPS requirement continues to be an applicable requirement. Therefore, AQM has incorporated this requirement by adding the reference of the NSPS to this condition.
Condition 3, Table 1.e.10.i.C	The Owner/Operator shall not cause or allow the emission of visible air contaminants and/or smoke from the FCCU bypass stack when it is in operation, the shade or appearance of which is greater than 50 percent opacity. <i>[Reference Regulation No 14 Section 2.3dated 07/17/84].</i>	Reference has been modified to include the Section 2.3 of Regulation 14.	Removal of Emission Standard because Condition 3, Table 1.e.10.i.A is more stringent.	M	AQM concurs that the standard in Condition 3, Table 1.e.10.i.A is more stringent than the Regulation 14, section 2.3 requirement in this condition. However, Section 2.3 of Regulation 14 continues to be an applicable requirement. Therefore, AQM has incorporated this requirement by adding the reference of Section 2.3 of Regulation 14 to this condition.
Condition 3, Table 1.e.10.ii.B	Compliance with emission standard C shall be based on conducting daily visible emissions evaluations, to the extent practicable, in accordance with EPA RM 9.	[RESERVED]	See comments for Condition 3, Table 1.e.10.i.C.	M	Concur

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Condition 3, Table 1.e.2.iv.A	H <sub>2</sub> SO <sub>4</sub> : H2SO4: in accordance with Reference Method 8 in Appendix "A" of 40 CFR Part 60, or other testing methodology approved by the Department.	H <sub>2</sub> SO <sub>4</sub> : [RESERVED]	Monitoring/Testing requirement is listed in Condition 3, Table 1.e.7.iii	M	Concur
Condition 3, Table 1.g.1.iv.F	Recordkeeping... CEMS data, calibration and audit results and stack test results	[RESERVED]	Recordkeeping requirements are included in other sections of the permit	M	Concur
Condition 3, Table 1.g.2.i.B	PM emissions shall not exceed 0.3lb/mmBtu heat input, maximum 2-hour average. <i>[Reference: Regulation No. 4 Section 2.1 dated 2/1/81]</i>	[RESERVED]	Removal of Emission Standard because Condition 3, Table 1.g.2.i.A is more stringent.	M	Concur. However, because the requirement of Section 2.1 of regulation 4 continues to be an applicable, the reference of Regulation 4 has been added to Condition 3, Table 1.ga.2.i.A.
Condition 3, Table 1.g.2.iii.B	Compliance with emission standard B. shall be based on compliance with Emission Standard A.3.	[RESERVED]	See comments for Condition 3, Table 1.g.2.i.B	M	Concur
Condition 3, Table 1.g.2.iv.B	The Owner/Operator shall continuously monitor cooling water flow rate.	[RESERVED]	Include requirement in Condition 3, Table 1.g.1, "Conditions Applicable to Multiple Pollutants".	M	Concur
Condition 3, Table 1.g.2.v.B & 6.iv.C	Recordkeeping: ... Hourly cooling water flow rates	[RESERVED]	Include requirement in Condition 3, Table 1.g.1, "Conditions Applicable to Multiple Pollutants".	M	Concur
Condition 3, Table 1.g.4.v	The Owner/Operator shall maintain the following records: <i>[Reference:Permit:APC-98-0522 and Regulation No. 30 Section 6(a)(3)(ii) dated 12/11/00]</i> i. Stack test data	Comply with "Conditions Applicable to Multiple Pollutants" in Condition 3, Table 1.ga.1.iv.	The requirement to maintain stack test results is included in Condition 3(b).	M	Concur
Condition 3, Table 1.g.6.iii.B	For determining compliance with Emission Standard C, the cooling water flow rate shall be monitored continuously and the VOC concentration in the cooling water obtained quarterly using a method approved by the Department...	For determining compliance with Emission Standard (C), the VOC concentration in the cooling water shall be obtained quarterly using a method approved by the Department...	Include requirement in Condition 3, Table 1.g.1, "Conditions Applicable to Multiple Pollutants".	M	Concur

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Condition 3, Table 1.j.1.v.A	Semiannual reports for the preceding six month period shall be submitted to the Department by January 31 and July 31 of each calendar year. ...	[RESERVED]	Deviations of the permit conditions are reported semi-annually in the Title V Semi-Annual report in accordance with the requirements of Condition 3(c)(2) of this Permit.	M	Concur
Condition 3, Table 1.j.1.v.B	The Owner/Operator shall submit the following quarterly CEMS reports by January 31, April 30, July 31 and October 31 of each calendar year: 1. The SO <sub>2</sub> CERMS report shall include a report of excess emissions, quarterly audit results, data capture for the period and details of out of control periods. 2. The H <sub>2</sub> S CMS report shall include a report listing all rolling 3 hour periods during which the average concentration of H <sub>2</sub> S as measured by the H <sub>2</sub> S CMS exceeds 162 ppmv (dry) or 0.10 grain/dscf, quarterly audit results, data capture for the period and details of out of control periods. The data submitted with the Owner/Operator's quarterly H <sub>2</sub> S CMS NSPS report for the facility shall satisfy this reporting requirement.	A quarterly SO <sub>2</sub> CERMS report for the preceding quarter shall be submitted to the Department by January 30, April 30, July 30 and October 30 of each calendar year and shall include the information required by 40 CFR 60.7(c) and (d).	Revision of SO <sub>2</sub> quarterly CERMS reporting requirement to make it consistent with NSPS requirements  Include the requirement to submit quarterly H <sub>2</sub> S CMS reports in the Facility Wide section of the permit.	M	Concur  Premcor withdrew this proposal. AQM has not incorporated a common requirement for H <sub>2</sub> S in RFG. Instead, the original format of the TV permit has been preserved to include this applicable requirement for each specific unit.
Condition 3, Table 1.k.1.iv.D	None	Recordkeeping... The type of fuel combusted in 37-H-1 A/B and the fuel usage.	Addition of recordkeeping requirement to make it consistent with similar conditions in the Permit.	M	Concur

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Permit Citation	Current Title V Language	Proposed Title V Language	Reason for Requested Modification	Mod Type	AQM Comments
Condition 3, Table 1.k.1.v	Reporting: ... In addition to those required by Condition 3(c)(2) of this permit: A. The Owner/Operator shall comply with the following semi-annual excess emission report... B. The Owner/Operator shall submit the H <sub>2</sub> S CMS report...	Reporting: ... None in addition to those listed in Condition 3(c)(2) of this permit.  No change	Excess emissions are reported semi-annually in the Title V Semi-Annual report in accordance with the requirements of Condition 3(c)(2) of this Permit.  Include the H <sub>2</sub> S CMS reporting requirement in the Facility Wide section of the permit.	M	Concur  Premcor withdrew this proposal. AQM has not incorporated a common requirement for H <sub>2</sub> S in RFG. Instead, the original format of the TV permit has been preserved to include this applicable requirement for each specific unit.
Condition 3, Table 1.k.4.iv.A	Recordkeeping: ... A. All periods of exceedances of the emission standards.	Recordkeeping: ... B. [RESERVED]	Similar requirement is included in Condition 3(b) of the permit.	M	Concur
Condition 3, Table 1.k.4.v.A	The Owner/Operator shall for each occurrence of excess emissions, within 30 calendar days of becoming aware of such occurrence, supply the Department with the following information:...	[RESERVED]	Excess emissions are reported per Condition 3(c)(2).	M	Concur

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Condition 3, Table 1.k.5.iii	The Owner/Operator shall conduct a stack test within 60 days of replacement of the LTS catalyst by the KATALCO 83-3X catalyst, at the end of the first year and at two year intervals thereafter. A "Source Sampling Guidelines and Preliminary Survey Form" must be submitted and found acceptable to the Department at least thirty (30) days prior to the performance testing. Results of the performance testing in triplicate and a certificate of compliance shall be submitted to the Department within ninety (90) days after completion. The tests shall be conducted simultaneously on the CO <sub>2</sub> and deaerator vents using the same Department approved test methodology as was used in determining baseline emissions testing in June 2002. ...	The Owner/Operator shall conduct a stack test within 60 days of replacement of the LTS catalyst by the KATALCO 83-3X catalyst, at the end of the first year and at two year intervals thereafter. The tests shall be conducted simultaneously on the CO <sub>2</sub> and deaerator vents using the same Department approved test methodology as was used in determining baseline emissions testing in June 2002. ...	Stack testing requirements are listed in Condition 3(b)(1) of the permit.	M	Concur
Condition 3, Table 1.k.5.iv.A	Recordkeeping: ... A. Stack test results	Recordkeeping: ... A. [RESERVED]	This recordkeeping requirement is included in Condition 3(b).	M	Concur
Condition 3, Table 1.m.1.iv.A	Recordkeeping... All Monitoring/Testing records necessary to determine compliance with Operational Limitations A and B.	Recordkeeping... The type of fuel combusted in 42-H-1,2,3 and 42-H-7 and the fuel usage.	Addition of recordkeeping requirement to make it consistent with similar conditions in the Permit.	M	Concur

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Permit Citation	Current Title V Language	Proposed Title V Language	Reason for Requested Modification	Mod Type	AQM Comments
Condition 3, Table 1.m.1.v	In addition to those required by Condition 3(c)(2) of this permit: A. The Owner/Operator shall submit semiannual reports of all periods of exceedances of the 365 daily rolling average heat input to 42-H-1, 2, 3 and 42-H-7. B. The Owner/Operator shall comply with the following semiannual excess emission reports:... C. The Owner/Operator shall submit the H <sub>2</sub> S quarterly CMS report...	None in addition to those listed in Condition 3(c)(2) of this permit.          No change	Excess emissions are reported semi-annually in the Title V Semi-Annual report in accordance with the requirements of Condition 3(c)(2) of this Permit.  Include the requirement to submit the quarterly H <sub>2</sub> S CMS report in the Facility Wide section of the permit.	M	Concur          Premcor withdrew this proposal. AQM has not incorporated a common requirement for H <sub>2</sub> S in RFG. Instead, the original format of the TV permit has been preserved to include this applicable requirement for each specific unit.
Condition 3, Table 1.m.2.ii.A	Compliance with the emission standard shall be based on the fuel quality and by the monitoring/testing requirements.	Compliance with the Emission Standard shall be based on the fuel type and quality.	Revision of the permit language to make it consistent with similar conditions in the Permit.	M	Concur
Condition 3, Table 1.m.3.iv.A	Recordkeeping: ... A. All periods of exceedances of the emission standards.	Recordkeeping: ... A. [RESERVED]	Similar requirement is included in Condition 3(b) of the permit.	M	Concur
Condition 3, Table 1.n.1.v.A	Reporting: A. All records indicating exceedances of the standards in accordance with Condition 3(c)(2)(ii)(B)(3) of this permit.	Reporting: B. None in addition to those listed in Condition 3(c)(2) of this permit.	Requirement is listed in Condition 3(c)(2) of the permit.	M	Concur
Condition 3, Table 1.n.2.ii	No streams from any of the following units shall enter any part of the WWTP until they are treated by the spent caustic stripper in accordance with Emission Standard B. <i>[Reference: Permit: APC-95/0381]</i>	No spent caustic streams from any of the following units shall enter any part of the WWTP until they are treated by the spent caustic stripper in accordance with Emission Standard B. <i>[Reference: Permit: APC-95/0381]</i>	Clarification of the Permit language	M	Concur
Condition 3, Table 1.n.2.vi, ob.1.v, ob.2.v	Reporting Requirement: All records indicating exceedances of the standard in accordance with Condition 3(c)(2).	Reporting: None in addition to those listed in Condition 3(c)(2) of this permit.	Requirement is listed in Condition 3(c)(2) of the permit.	M	Concur



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Condition 3, Table 1.0a.1.v.A, 2.v.A, 3.v.A, 4.v.A, 5.v.A, 6.v.A, 7.v.A, 8.v.A, 9.v.A	All exceedances in accordance with Condition 3(c)(2) of this permit.	[RESERVED]	Requirement is listed in Condition 3(c)(2) of the permit.	M	Concur
Condition 3, Table 1.ob.1.iv	Record Keeping: Observation records shall be maintained in accordance with Condition 3(b).	Record Keeping: The following records shall be maintained in accordance with Condition 3(b): Records of qualitative emission observations and Method 9 evaluations when emissions were observed.	Revision of the permit language to make it consistent with similar requirements in other Title V permits.	M	Concur
Condition 5 – Compliance Schedule	The Company shall submit permit applications pursuant to Regulation 1102 of Delaware's <u>Regulations Governing the Control of Air Pollution</u> for the standby compressors identified in the application AQM 1001Y by no later than 08/31/2008. <i>[Reference Regulation No. 30 Section 6(c)(3), dated 11/15/93].</i>	This permit does not contain a compliance schedule. <i>[Reference Regulation No. 30, Section (6)(c)(3) dated 12/11/00]</i>	A permit application was submitted for the standby compressors. Thus, there is no longer a compliance schedule required for this permit.	M	Concur
Table of Contents	None	Attachment "D" - Protocol for Carbon Canister Monitoring – Oily Water Sewer	Incorporation of the Carbon Canister Monitoring Protocol as an attachment	M	Concur
Table of Contents	None	Attachment "E" - Protocol for Carbon Canister Monitoring – API/CPI Oily Water Separators	Incorporation of the Carbon Canister Monitoring Protocol as an attachment	M	Concur
Condition 3, Table 1.ac.2.iii	Monitoring/Testing: The H <sub>2</sub> S content of the inerting stream shall be monitored according to the approved Alternate Monitoring Program (AMP). <i>[Reference: Approval of NSPS Subpart J Alternate Monitoring Plans dated October 31, 2002]</i>	Monitoring/Testing: None in addition to those listed in Condition 3(b)(1)(ii) of this permit.	The inerting stream is exempt from NSPS Subpart J due to the recent revision of the definition of "fuel gas" per 40 CFR 60.101(d). See Section 1.2.	S	Concur
Condition 3, Table 1.ac.2.iv.B	B. Monitored data required by the AMP.		Removal of the AMP recordkeeping requirement (See Section 1.2).	S	Concur

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Permit Citation	Current Title V Language	Proposed Title V Language	Reason for Requested Modification	Mod Type	AQM Comments
Condition 3, Table 1.c.2.iv.C	C. The H <sub>2</sub> S content of the Merox vent stream shall be monitored according to the approved Alternate Monitoring Program (AMP). [Reference: Approval of NSPS Subpart H Alternate Monitoring Plans dated October 21, 2002]	C. [RESERVED]	Removal of the requirements for monitoring fuel gas streams per the Alternate Monitoring Plan for NSPS Subpart J. See Section 1.2.	S	Concur
Condition 3, Table 1.c.4.i.C (Conditions 3, Table 1.da.4.i.B, e.4.i.A, k.4.i.B & m.3.i.B contain similar language)	For 21-H-701: During the ozone season (May 1, 2008 through September 30, 2008), the Owner/Operator shall hold in its compliance account and/or its overdraft account, as of the NO <sub>x</sub> allowance transfer deadline of each control period, a quantity of NO <sub>x</sub> allowances available for deduction that is equal to or greater than the total NO <sub>x</sub> emissions from 21-H-701 for that control period. [Reference: Permit: <u>AQM-003/00016-1</u> dated May 1, 2002 and Regulation No. 39 Section 2.a. dated 12/11/00]	[RESERVED]	Removal of emission standard due to the termination of the NO <sub>x</sub> Budget Program.	S	Concur
Condition 3, Table 1.c.4.iii (Conditions 3, Table 1.da.4.iii.B, e.4.iii.B, k.4.iii & m.3.iii.A contain similar language)	The CEMS for NO <sub>x</sub> and the diluent must be certified by satisfying the applicable Performance Specifications in 40 CFR, Part 75, Appendix "A". Quality Assurance procedures for the NO <sub>x</sub> and diluent analyzers shall be demonstrated in accordance with 40 CFR, Part 75, Appendix "B". [Reference: Permit: <u>APC-95/0570 (A2)</u> and Regulation No. 39 Section 8 dated 12/11/00]	The QA/QC procedures for the NO <sub>x</sub> CEMS shall be established in accordance with the procedures in 40 CFR, Part 60, Appendix "F". [Reference: Permit: <u>APC-95/0570 (A2)</u> ]	Revision of the CEMS QA/QC requirements due to the termination of the NO <sub>x</sub> Budget Program.	S	Concur

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Condition 3, Table 1.c.4.iv.B (Conditions 3, Table 1.da.4.iv.B, e.4.iv, k.4.iv.B & m.3.iv.B contain similar language)	Unless otherwise provided, the owners and Operators of the NOx Budget source and each NOx Budget unit at the source shall keep on site at the source each of the following documents...	[RESERVED]	Removal of recordkeeping requirements due to the termination of the NO <sub>x</sub> Budget Program.	S	Concur
Condition 3, Table 1.c.4.v.B (Conditions 3, Table 1.da.4.v.B, e.4.v.B, k.4.v.B & m.3.v.B contain similar language)	NOx authorized account representative of a NOx Budget source and each NOx Budget unit at the source shall submit the reports and compliance certifications required under the NOx Budget Trading Program, including those under Regulation No. 39 § 7, 8, and 11.	[RESERVED]	Removal of reporting requirement due to the termination of the NO <sub>x</sub> Budget Program.	S	Concur
Condition 3, Table 1.c.4.vi (Conditions 3, Table 1.da.4.vi, e.4.vi, k.4.vi & m.3.vi contain similar language)	In addition to those listed in Condition 3(c)(3) of this permit, each document submitted to the Department and the Administrator pursuant to this NOx Budget permit shall be signed and certified by the Authorized Account Representative and shall contain the following language:...	None in addition to those listed in Condition 3(c)(3) of this permit.	Removal of certification requirement due to the termination of the NO <sub>x</sub> Budget Program.	S	Concur

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Permit Citation	Current Title V Language	Proposed Title V Language	Reason for Requested Modification	Mod Type	AQM Comments
Condition 3, Table 1.da	<u>Emission Units No. 22</u> : Fluid Coking Unit (FCU): FCU, Wet Gas Scrubber (WGS), and Selective Non-Catalytic Reduction System (SNCR) (Emission point/s 22-2 or 22-3), FCU Start Up Heater 22-H-1 (Emission point/s 22-2 or 22-3), FCU Selas Steam Superheater 22-H-2 (Emission point 22-4), FCU Carbon Monoxide Boiler 22-H-3 (Emission point 22-2) and FCU Back Up Incinerator 22-H-4 (Emission point 22-3);		Incorporation of recently issued operating permit conditions in Permit APC-81/0829-OPERATION (Amendment 7)	S	Concur
Condition 3, Table 1.da.11.iii.A	For unit 22-H-2, visual observations in accordance with paragraph C below shall be conducted within one (1) week of the annual tune-up. <i>[Reference Reg. No. 30 Section 6(a)(3) dated 12/11/00].</i>	[RESERVED]	Removal of monitoring requirement. No visible emissions have been observed from these sources during observations conducted in the past 3 years, and qualitative observations are conducted on a daily basis. See Attachment 2.	S	Concur
Condition 3, Table 1.da.11.iii.E	None	For periods when the CO Boiler (22-H-3) is firing refinery fuel gas only, the Owner/Operator shall conduct daily qualitative stack observations to determine the presence of any visible emissions when the unit is in operation. <u>1.</u> If visible emissions are observed, the Owner/Operator shall take corrective actions and/or conduct a visible observation in accordance with Paragraph C above. <u>2.</u> If no visible emissions are observed, no further action is required.	The parametric monitoring of pressure drop and pump discharge pressure is not an appropriate method to use to determine compliance with the Visible Emissions standard when only refinery fuel gas is fired in the CO Boiler.	S	Concur

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Permit Citation	Current Title V Language	Proposed Title V Language	Reason for Requested Modification	Mod Type	AQM Comments
Condition 3, Table 1.e	<u>Emission Units No. 23:</u> Fluid Catalytic Cracking Unit (FCCU); FCCU Reactor, Catalyst Regenerator, Start up Heaters 23-H-1 A and B, Carbon Monoxide Boiler, 23-H-3, and Wet Gas Scrubber System (WGS) (emission point 23-1);		Incorporation of recently issued operating permit conditions in Permit APC-82/0981- CONSTRUCTION/OPERATION (Amendment 7)(NSPS)	S	Concur
Condition 3, Table 1.e.10.iii.D&E	None	<p>D. For periods when the CO Boiler (23-H-3) is firing refinery fuel gas only, the Owner/Operator shall conduct daily qualitative stack observations to determine the presence of any visible emissions when the unit is in operation.</p> <p><u>1.</u> If visible emissions are observed, the Owner/Operator shall take corrective actions and/or conduct a visible observation in accordance with Paragraph E below.</p> <p><u>2.</u> If no visible emissions are observed, no further action is required.</p> <p><u>E.</u> If required under paragraphs D above, the Owner/Operator shall, in accordance with Subsection 1.5(c) of Regulation No. 20, conduct visual observations at fifteen-second intervals for a period of not less than one hour except that the observations may be discontinued whenever a violation of the standard is recorded. The additional procedures, qualification and testing to be used for visually determining the opacity shall be those specified in Section 2 &amp; 3 (except for Section 2.5 and the second sentence of Section 2.4) of Reference Method 9 set forth in Appendix A, 40 CFR, Part 60, revised July 1, 1982. <i>[Reference Reg. No. 20, Section 1.5(c) dated 12/7/88].</i></p>	The parametric monitoring of pressure drop and pump discharge pressure is not an appropriate method to use to determine compliance with the Visible Emissions standard when only refinery fuel gas is fired in the CO Boiler.	S	Concur

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Permit Citation	Current Title V Language	Proposed Title V Language	Reason for Requested Modification	Mod Type	AQM Comments
Condition 3, Table 1.gb	None		Incorporation of recently issued operating permit conditions in Permit APC-2005/0197-OPERATION (RACT)(MACT)(NSPS)	S	Concur
Condition 3, Table 1.j	<u>Emission Units No. 28:</u> Sulfur Recovery Area (SRA); Claus Units I and II; Sulfur Pits and Shell Claus Offgas Treatment (SCOT) Units I and II. (Emission points 28-1 and 28-2)		Incorporation of recently issued operating permit conditions in Permit APC-90/0264-CONSTRUCTION/OPERATION (Amendment 7)(NSPS)	S	Concur
Condition 3, Table 1.j.3.vi.B	During planned start-up and shutdown periods of incineration, ambient air monitoring data for the affected period shall be submitted to the Department daily. At the Department's request, copies of available air monitoring data shall be furnished to the Air Quality Management Division.	[RESERVED]	Removal of reporting requirement. Data may be requested per Condition 3(b) of the permit.	S	Concur
Condition 3, Table 1.m.1.iii.D	The H <sub>2</sub> S content of the process vent gas from the reactor lift engages vent and CCR lift engager vent shall be monitored according to the approved Alternate Monitoring Program (AMP). <i>[Reference Approval NSPS Subpart J Alternate Monitoring Plans dated October 31, 2002]</i>	[RESERVED]	Removal of the requirements for monitoring fuel gas streams per the Alternate Monitoring Plan for NSPS Subpart J. See Section 1.2.	S	Concur
Table of Contents	None	Condition 3-Table 1.gb - Tier 2 Gasoline Project involving modifications, ancillary equipment and tie-ins, and relocation of certain existing equipment to the existing cracked naphtha hydrotreater (CNHT, Unit 25), the existing Selective Hydrogenation Unit at the Ether Plant (SHU, Unit 43), and the Diglycolamine system (DGA, Unit 24)	Insertion of a new section for permit condition associated with the Tier 2 Gasoline Project.	S	Concur

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**Table 10: Summary of Modifications – Part 3**

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Condition 1, 2 & 3	<b><u>Condition 1. Emission Units Identification</u></b> <b><u>Condition 2. General Requirements</u></b> <b><u>Condition 3. Specific Requirements</u></b>		Various corrections of typographical errors or revisions to make permit language consistent with other Title V Permits	A	Concur
Condition 3, Table 1.a.2.ii.G	Compliance with Operational Limitation (A) shall be based on the H2S CEMS.	Compliance with Operational Limitation (I) shall be based on the H2S CEMS.	Correction of a typographical error	A	Concur
Condition 3, Table 1.a.6.i.B	The Owner/Operator shall not cause or allow the emissions of CO in excess of 0.34 lb/mmBtu from Boilers 80-1, 80-2 and 80-3.	The Owner/Operator shall not cause or allow the emissions of CO in excess of 0.34 lb/mmBtu from Boilers 80-1, 80-2 and 80-3 on a 24 hour rolling average basis.	Inclusion of the averaging period that is listed in the Reg. 1102 operating permit	A	Concur
Condition 3, Table 1.b.1.vi	None in addition to those listed in Condition 3(c)(1) of this permit.	None in addition to those listed in Condition 3(c)(3) of this permit.	Correction of a typographical error	A	Concur
Condition 3, Table 1.d.9.vi	The Owner/Operator shall provide quarterly reports of all periods of opacity exceedances in the quarterly excess emission report required by Condition 3, Table 1.d.1.vi.C.	Comply with "Conditions Applicable to Multiple Pollutants" in Condition 3, Table 1.d.1.vi (EU-84).	Correction of a typographical error. There is no Condition 3, Table 1.d.1.vi.C in the permit.	A	Concur
Condition 3, Table 1.a.2.i.A	No liquid fuels shall be burned in any of the boilers. Only desulfurized refinery fuel gas (RFG) or natural gas may be fired in Boilers 80-1, 80-2 and 80-4. Only desulfurized RFG, natural gas or syngas may be fired in Boiler 80-3.	Only desulfurized refinery fuel gas (RFG) or natural gas may be fired in Boilers 80-1, 80-2 and 80-4. Only desulfurized RFG, natural gas or syngas may be fired in Boiler 80-3.	The operational limitation that no liquid fuels shall be burned in any of the boilers is not an applicable requirement imposed by the applicable state operating permit or by federal regulations.	S (Appeal)	AQM had incorporated this condition subsequent to finding Premcor engaging in the practice of combusting condensate liquid fuel in Boilers 1 and 3. However, AQM has verified by an on-site inspection that the liquid fuel lines to the boilers have been disconnected. Premcor has also confirmed as such in their letter dated 11.19.2009. Therefore, AQM is amending this condition as requested.

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Permit Citation	Current Title V Language	Proposed Title V Language	Reason for Requested Modification	Mod Type	AQM Comments
Condition 3, Table 1.a.2.ii.A	Compliance with Operational Limitation (A) shall be based on Premcor demonstrating that only the allowable fuels and no other fuels have been combusted in the boilers during the compliance period and on the Monitoring/Testing requirements.	Compliance with Operational Limitation (A) shall be based on Monitoring/Testing requirements.	The operational limitation that no liquid fuels shall be burned in any of the boilers is not an applicable requirement imposed by the applicable state operating permit.	S (Appeal)	Concur
Condition 6	<b><u>Permit Shield...</u></b>	See Permit Mark-up for Proposed Changes	Does not provide the full permit shield contemplated by DE Reg. 30	S (Appeal)	Concur
Condition 3, Table 1.a.2.iii.C	A continuous flow monitoring system shall be installed to measure the amount of syngas combusted in Boiler 80-3. [Reference APC-90/0290 (A5) (RACT)]	[RESERVED]	The requirement to monitor the amount of syngas combusted is included in the Monitoring/Testing requirement listed in Condition 3, Table 1.a.2.iii.G	M	Concur
Condition 3, Table 1.a.2.v.B, f.1.v.A	All stack emission testing and monitor certification testing shall be performed in accordance with Section 3(b)(1)(iii).	[RESERVED]	Requirement is listed in Condition 3(b)(1)(iii).	M	Concur
Condition 3, Table 1.a.2.v.E	The Owner/Operator shall submit the following semi-annual excess emissions reports. ...	[RESERVED]	Excess emissions are reported semi-annually in the Title V Semi-Annual report in accordance with the requirements of Condition 3(c)(2) of this Permit.	M	Concur
Condition 3, Table 1.a.2.v.F	The Owner/Operator shall submit quarterly CEMS and COMS repots by January 31, April 30, July 31 and October 31 of each calendar year. The CEMS and COMS reports shall include a report of excess emissions, quarterly audit results, data capture for the period and details of out of control periods.	[RESERVED]	CEMS reporting requirements are included in "Combined Limits" in Condition 3, Table 1.f	M	Concur



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Permit Citation	Current Title V Language	Proposed Title V Language	Reason for Requested Modification	Mod Type	AQM Comments
Condition 3, Table 1.a.2.v.I.1	The Owner/Operator shall submit the following quarterly CEMS reports by January 31, April 30, July 31 and October 31 of each calendar year: <u>1.</u> The H2S CMS reports shall include a report listing all rolling 3 hour periods during which the average concentration of H2S as measured by the H2S CMS exceeds 162 ppmv (dry) or 0.10 grain/dscf, quarterly audit results, data capture for the period and details of out of control periods. The data submitted with the Owner/Operator's quarterly H2S CMS NSPS report for the facility shall satisfy this reporting requirement.	The Owner/Operator shall submit the following quarterly CEMS reports by January 30, April 30, July 30 and October 30 of each calendar year: <u>1.</u> The H2S CMS reports shall include the information required by 40 CFR 60.7(c) and (d).	Clarification of permit language to include the exact regulatory language for the reporting requirement.	M	Concur
Condition 3, Table 1.a.2.v.K	The Owner/Operator shall submit semi-annually all records necessary to demonstrate compliance with Condition 3, Table 1.a.2.i.A. and Condition 3, Table 1.a.2.ii.A.	[RESERVED]	A certification of compliance with all permit conditions is submitted with the semi-annual Title V report. Therefore, there is no need for this additional requirement.	M	Concur
Condition 3, Table 1.a.5.i.E	The Owner/Operator shall not cause or allow the emission of NOx in excess of 0.25 lb/mmBtu from Boilers 80-1, 80-2, 80-3 and 80-4 on a 24-hour rolling average basis. <i>[Reference Regulation No. 12 Section 3.2(a) dated 11/24/1993 (NOx RACT)]</i>	[RESERVED]	Requirement applies to the combustion of fuel oil which is prohibited in these units.	M	Concur

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Permit Citation	Current Title V Language	Proposed Title V Language	Reason for Requested Modification	Mod Type	AQM Comments
Condition 3, Table 1.c.1.i.A	Syngas may be diverted to the flare during periods when process upsets, malfunctions, safety trips, start-ups or shut-downs occur in the combustion turbines, gasification section, gas cooling section, the amine acid gas removal system, the slurry preparation section, the refinery sulfur recovery unit or in the air separation plant.	Syngas may be diverted to the flare during periods when process upsets, malfunctions, safety trips, start-ups or shut-downs occur in the combustion turbines, gasification section, gas cooling section, the amine acid gas removal system, the slurry preparation section, Boiler 3, the refinery sulfur recovery unit or in the air separation plant.	Clarification of the permit language to specifically allow for syngas to be diverted to the flare during periods when process upsets, malfunctions, etc. occur in Boiler 3.	M	Concur
Condition 3, Table 1.d.1.vi.A	The Owner/Operator shall submit the following semi-annual excess emissions reports. ...	[RESERVED]	Excess emissions are reported semi-annually in the Title V Semi-Annual report in accordance with the requirements of Condition 3(c)(2) of this Permit.	M	Concur
Condition 3, Table 1.d.4.i.E	Except during startup, shutdown and fuel transfers, the Owner/Operator shall not cause or allow the emission of NO <sub>x</sub> in excess of the following based on a one (1) hour average: <u>1.</u> 42 ppm @ 15% O <sub>2</sub> when combusting gas. <u>2.</u> 88 ppm @ 15% O <sub>2</sub> when combusting LSDF. <i>[Reference Regulation No. 12 Section 3.5, dated 11/24/1993 (NO<sub>x</sub> RACT)]</i>	[RESERVED]	Removal of Emission Standard because Condition 3, Table 1.d.4.i.C is more stringent.	M	Concur. However, because the requirement of Section 3.5 of Regulation 12 continues to be an applicable requirement, the reference of Regulation 12 has been added to Condition 3, Table 1.d.4.i.E.
Condition 3, Table 1.f.1.v.B	The Owner/Operator shall submit the following semi-annual excess emissions reports. ...	[RESERVED]	Excess emissions are reported semi-annually in the Title V Semi-Annual report in accordance with the requirements of Condition 3(c)(2) of this Permit.	M	Concur

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Permit Citation	Current Title V Language	Proposed Title V Language	Reason for Requested Modification	Mod Type	AQM Comments
Condition 3, Table 1.f.1.v.C.2	The SO <sub>2</sub> and NO <sub>x</sub> CEMS reports shall include a report of excess emissions, quarterly audit results, data capture for the period and details of out of control periods.	SO <sub>2</sub> NO <sub>x</sub> and CO CEMS and COMS reports for CEMS required for the Boilers and CCUs shall include the following: <ol style="list-style-type: none"> <li>1. Excess emissions and the nature and cause of the excess emissions, if known. The summary shall consist of emission averages, in the units of the applicable standard, for each averaging period during which the applicable standard was exceeded.</li> <li>2. The date and time identifying each period during which the continuous monitoring system was inoperative, except for zero and span checks, and the nature of system repairs or adjustments.</li> <li>3. When no excess emissions have occurred and the CEMS have not been inoperative, repaired, or adjusted, such information shall be included in the report.</li> </ol>	Clarification of permit language to specify the pollutants monitored by CEMS and to include the regulatory language from DE Reg. 1117.	M	Concur
Condition 3, Table 1.a.5.i.F, d.4.i.F	During the ozone season (May 1, 2008 through September 30, 2008), the Owner/Operator shall hold in its compliance account and/or its overdraft account, as of the NO <sub>x</sub> allowance transfer deadline of each control period, a quantity of NO <sub>x</sub> allowances available for deduction that is equal to or greater than the total NO <sub>x</sub> emissions from each boiler for that control period. <i>[Reference: Permit: AQM-003/00016-I dated 05/01/2002 and Regulation No. 39 Section 2(a) dated 12/11/00 (NO<sub>x</sub> Budget Trading Program)]</i>	[RESERVED]	Removal of emission standard due to the termination of the NO <sub>x</sub> Budget Program.	S	Concur

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<b>Permit Citation</b>	<b>Current Title V Language</b>	<b>Proposed Title V Language</b>	<b>Reason for Requested Modification</b>	<b>Mod Type</b>	<b>AQM Comments</b>
Condition 3 - Table 1.a.5.iv.B, d.4.iv.B, f.4.iv.B	The CEMS shall satisfy the applicable Performance Specifications in 40 CFR Part 75, Appendix "A" and the Quality Assurance/Quality Control (QA/QC) procedures for NO <sub>x</sub> CEMS in accordance with 40 CFR Part 75, Appendix "B".	The Quality Assurance/Quality Control (QA/QC) procedures for NO <sub>x</sub> CEMS shall be established in accordance with 40 CFR Part 60, Appendix "F".	Revision of monitoring requirement due to the termination of the NO <sub>x</sub> Budget Program.	S	Concur
Condition 3 - Table 1.a.5.v.B, d.4.v.B	Unless otherwise provided, the owners and Operators of the NO <sub>x</sub> Budget source and each NO <sub>x</sub> Budget unit at the source shall keep on site at the source each of the following documents...	[RESERVED]	Removal of recordkeeping requirement due to the termination of the NO <sub>x</sub> Budget Program.	S	Concur
Condition 3 - Table 1.a.5.vi, d.4.vi	NO <sub>x</sub> authorized account representative of a NO <sub>x</sub> Budget source and each NO <sub>x</sub> Budget unit at the source shall submit the reports and compliance certifications required under the NO <sub>x</sub> Budget Trading Program, including those under Regulation No. 39 § 7, 8, and 11.	[RESERVED]	Removal of reporting requirement due to the termination of the NO <sub>x</sub> Budget Program.	S	Concur
Condition 3 - Table 1.a.5.vii, d.4.vii	In addition to those listed in Condition 3(c)(3) of this permit, each document submitted to the Department and the Administrator pursuant to this NO <sub>x</sub> Budget permit shall be signed and certified by the Authorized Account Representative and shall contain the following language:...	Comply with "Conditions Applicable to Multiple Pollutants" in Condition 3, Table 1.a.2.v (EU-80).	Removal of certification requirement due to the termination of the NO <sub>x</sub> Budget Program.	S	Concur

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<b>Permit Citation</b>	<b>Current Title V Language</b>	<b>Proposed Title V Language</b>	<b>Reason for Requested Modification</b>	<b>Mod Type</b>	<b>AQM Comments</b>
Condition 3 - Table 1.c.3.iv.A	The Owner/Operator shall monitor the sulfur content in the coke slurry on a daily basis when raw syngas is diverted to this flare.	No change.	Reduce frequency of monitoring to weekly based on limited variability of the sulfur content data that has been collected in the past. See Attachment 2.	S	AQM disagrees. Because syngas flaring episodes have been unpredictable and can be triggered by various causes, AQM believes it is necessary to conduct daily monitoring of the sulfur content in the coke slurry when raw syngas is diverted to the flare.
Condition 3 - Table 1.f.9	None		Incorporation of recently issued operating permit conditions in Permits APC-90/0288-O(A6), APC-90/0289-O(A7), APC-90/0290-O(A6), APC-90/0291-O(A1) & APC-97/0503-O(A5)(LAER)(NSPS)	S	Concur

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**FACILITY WIDE REQUIREMENTS**

1990 CAAA, Section 112(r)

The facility is subject to and has registered in compliance with the State of Delaware.

1990 CAAA, Title VI

The facility has air conditioners and refrigeration equipment that use CFCs, HCFCs, or other ozone depleting substances. The equipment contains a refrigerant charge greater than 50 pounds. Facility personnel do maintain, service, repair or dispose of any motor vehicle air conditioners or appliances, as defined in 40 CFR Part 82.152. The refinery's application states 40 CFR Part 82 subparts B and F are applicable to the facility but not applicable to any unit covered by the Title V part 1 permit.

Compliance Schedule

The facility is not under a compliance schedule.

Permit Shield

The facility has requested a Permit Shield. Compliance with the terms and conditions of this permit shall be deemed compliance with the applicable requirements as provided in Condition 6 Table 1 in each of Parts 1, 2 and 3 of the permit.

Compliance Assurance Monitoring (CAM) Rule

For an emission unit to be subject to 40 CFR Part 64 (the CAM Rule) an emission unit must meet the following 3 criteria: 1) The unit must be subject to an emission limitation or standard for the applicable regulated air pollutant, 2) The unit must use a control device to achieve compliance with any such emission limitation or standard; and 3) The unit must have potential pre-control device emissions of the applicable regulated air pollutant greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. The refinery's application erroneously states the major source threshold for NO<sub>x</sub> is 100 TPY.

Part 1:

The CAM applicability determination for Part 1 was made when the permit was renewed in 2008. CAM is not applicable.

Part 3:

CAM is not applicable to the boilers and combustion turbines because they do not employ control devices for PM emissions and there are CEMS for the other major pollutants (NO<sub>x</sub>, SO<sub>2</sub>, and CO).

Part 2:

Unit 22 (the Fluid Coking Unit) covered under Section da and Unit 23 (Fluid Catalytic Cracking Unit) covered under Section e of this permit are Pollutant specific Emissions Units (PSEUs) subject to CAM requirements because these units satisfy the following requirements:

- Each PSEU is located at a major source that is required to obtain a TV permit
- Each PSEU is subject to an emission limitation for particulate matter that is not exempt
- Each PSEU has an add on control device
- Each PSEU has potential pre-control device emissions of particulate matter greater than the major source threshold
- Each PSEU is not municipally owned or an otherwise exempted entity.

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**Table 11: CAM Applicability Determination – Part 2**

PSEUs 22 and 23	Indicator # 1	Indicator # 2
Monitoring Approach	Continuously monitor pressure drop across Agglo-filtering modules and Cyclolab droplet Separators. The monitoring is used to determine compliance with the opacity limit of 20 % for an aggregate of more than 3 minutes in any 1-hour or more than 15 minutes in any 24-hour period.	Continuously monitor the quench/pre-scrubber recirculation pump discharge pressure. This monitoring is used to determine compliance with the opacity limit of 20 % for an aggregate of more than 3 minutes in any 1-hour or more than 15 minutes in any 24-hour period.
Indicator Range	Minimum delta-P of 6" water column for not more than 3 minutes in any 1-hour or more than 15 minutes in any 24-hour period.	Minimum discharge pressure satisfying the less stringent of: 115 psig or 95 % of the average discharge pressure recorded during performance testing as specified in <i>Permit: APC-81/0829 (A7)</i> for no more than 3 minutes in any 1-hour or more than 15 minutes in any 24-hour period.
Specifications for Representativeness	Pressure drop indication is based on pressure indicators located prior to the Agglo-filtering modules and prior to the Cyclolab Droplet Separators	Pressure indicators located after the quench/pre-scrubber recirculation pumps
Verification Procedures	Annual stack tests RM 5B, RM 5Bb/202, RM 8 RM 9	Annual stack tests RM 5B, RM 5Bb/202, RM 8 RM 9
Data Collection	By the refinery Data Acquisition System	By the refinery Data Acquisition System
Monitoring Frequency	Continuous	Continuous

AQM finds the submitted CAM plans for PSEUs 22 and 23 to satisfy the requirements in 40 CFR Part 64.

It is recommended the draft operating permit be issued to the Company and the EPA, and advertised in the News Journal for the 30-day public review period and the affected states of Maryland, New Jersey and Pennsylvania.

PEF:CRR:BAS:slb

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pc: Dover Title V File  
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